



EXECUTIVE OFFICE OF THE PRESIDENT  
OFFICE OF MANAGEMENT AND BUDGET  
WASHINGTON, D.C. 20503

September 28, 2004

OMB BULLETIN NO. 04-04

TO THE HEADS OF SELECTED EXECUTIVE DEPARTMENTS AND AGENCIES

SUBJECT: Fiscal Year 2005 Information Collection Budget

1. **What is the purpose of this bulletin?** This bulletin provides instructions to the Chief Information Officer (CIO) on the preparation and submission of information to the OMB Office of Information and Regulatory Affairs (OIRA) that will be the basis for the Fiscal Year 2005 Information Collection Budget (ICB). This annual report describes the information collection burden imposed by the Federal government on the public, progress of the agencies towards the burden reduction goals set forth in the Paperwork Reduction Act of 1995 (PRA), and agency activities to improve the public's access to Federal information resources.
2. **When are responses to the bulletin due?** Submissions are due to OIRA no later than **Monday, November 22, 2004.**
3. **Who must respond to this bulletin?** The Chief Information Officers from the following agencies must comply with the requirements of this bulletin:

Department of Agriculture  
Department of Commerce  
Department of Defense  
Department of Education  
Department of Energy  
Department of Health and Human Services  
Department of Homeland Security  
Department of Housing and Urban Development  
Department of the Interior  
Department of Justice  
Department of Labor  
Department of State  
Department of Transportation  
Department of the Treasury  
Department of Veterans Affairs  
Environmental Protection Agency  
Federal Acquisition Regulation (FAR Secretariat)  
Federal Communications Commission  
Federal Deposit Insurance Corporation  
Federal Energy Regulatory Commission

Federal Trade Commission  
National Aeronautics and Space Administration  
National Science Foundation  
Nuclear Regulatory Commission  
Securities and Exchange Commission  
Small Business Administration  
Social Security Administration

If your agency is not listed here, you do not need to comply with this bulletin.

4. **How does the ICB fit into OMB's 'zero tolerance' approach to violations of the Paperwork Reduction Act?** The PRA requires that agencies obtain OMB approval for all collections of information. A collection of information without current OMB approval constitutes a violation of the PRA. Each year, OMB is required to report to Congress PRA violations published in the *Information Collection Budget* of the United States.

Over the past several years, OMB has been working closely with agencies to address violations of the PRA. Our goal this year, as outlined in the OMB memo sent to agencies in September 2004 is to eliminate all existing violations of the PRA as soon as possible. As part of this memo, we forwarded a list of expired collections to you in September and requested that you take steps to identify and resolve any existing violations. This list also included a column to report collections that were used (or are currently in use) without an OMB control number (i.e., "bootleg" collections) that were discovered in FY 2004. You **must** designate any transaction related to a violation, including an expiration, reinstatement, or approval, as a lapse in OMB approval in your response to Appendix B.

In addition, as part of the ICB process, we will be following up to verify information that was submitted.

5. **How does the ICB fit into OMB's initiatives under the E-Government Act and the Government Paperwork Elimination Act (GPEA)?** These government-wide statutes, the E-Government Act and GPEA, have implications for information collections covered by the Paperwork Reduction Act. While information is collected on these statutes through other reporting mechanism (e.g. the annual E-Gov Act Report), agencies should be cognizant of these statutes when preparing their ICB submission and work to coordinate agency efforts under the PRA, GPEA, and the E-Gov Act.
6. **What must my agency's submission include?** Your CIO is required to submit the following information:
- a. a detailed description of new agency initiatives to improve information collection in accordance with the instructions in Appendix A;
  - b. your agency's comprehensive burden accounting, including aggregate burden totals, program changes broken into several categories, and examples of significant burden changes prepared in accordance with the instructions in Appendix B; and

All submissions should be consistent with OMB fiscal and policy guidance.

7. **In what format should the CIO provide this information to OMB?** The information required under this bulletin should be sent electronically to Lorraine Hunt. ([Lorraine D. Hunt@omb.eop.gov](mailto:Lorraine.D.Hunt@omb.eop.gov)). Where the Bulletin asks you to enter information in the tables we provide, you should submit tables in the **same format**.

Please use Microsoft Excel for your submission. **We will not accept files in Microsoft Access.**

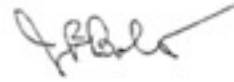
8. **What is the legal authority under which OMB is requiring this information?** This bulletin is issued pursuant to the Budget and Accounting Act of 1921, as amended; the Budget and Accounting Procedures Act of 1950, as amended; and the Paperwork Reduction Act of 1995, as amended.
9. **Will OMB conduct hearings on my agency's submission?** OMB will schedule, as needed, hearings with an agency on its progress toward burden reductions goals and agency compliance with the Paperwork Reduction Act.
10. **Who should I contact for further information?** Questions about specific agency matters should be directed to your agency's Desk Officer within OMB's Office of Information and Regulatory Affairs.

**Questions about this Bulletin should be directed to: John Kraemer**  
**Phone: 202-395-4816. Email: [John.Kraemer@OMB.EOP.GOV](mailto:John.Kraemer@OMB.EOP.GOV)**

**Questions about Violations should be directed to: Carolyn Lovett**  
**Phone: 202-395-7151. Email: [Carolyn L. Lovett@OMB.EOP.GOV](mailto:Carolyn.L.Lovett@OMB.EOP.GOV)**

11. **When does this bulletin expire?** This bulletin expires September 30, 2005.
12. **What changes has OMB made to this bulletin since last year?**
- a. This year, in Appendix A, we are asking agencies which generate burdens equal to or in excess of 10 million hours annually to provide OMB with up to three initiatives which have resulted in a cumulative burden reduction level of approximately 1% of total agency burden. We are requesting that all other respondents provide a single primary burden reduction initiative.
  - b. This year we forwarded a memo to agencies in September in which we asked you for data regarding your agency's compliance with the information collection provisions of the Paperwork Reduction Act. Specifically, we requested that you identify all violations of the PRA. The information you report in Appendix B, Figure 1, Column 4 of this Bulletin **must** reflect the information provided to OMB on violations. While this Bulletin does not include a Violations Appendix, we will be following up with agencies to verify the information submitted to OMB.

- c. This year we are asking agencies to provide a concise explanation of any changes you make to the information provided by OMB in Notes (please see column 9 of Figure 1 Appendix B). We believe this will help streamline the review process, and will reduce the time and energy requirements to confirm information for both the agencies and OMB.



Joshua B. Bolten  
Director

Attachments

## **BURDEN REDUCTION INITIATIVE**

1. **What is the purpose of this Appendix?** In the FY 2004 Information Collection Budget (ICB), we asked each agency to identify at least three major initiatives to improve program performance by enhancing the efficiency of information collections and to reduce paperwork burden on the public.

This year, we are asking agencies which generate burdens equal to or in excess of 10 million hours annually to provide OMB with up to three initiatives which have resulted in a cumulative burden reduction level of approximately 1% of total agency burden. We are requesting that all other respondents provide a single primary burden reduction initiative.

All initiative submissions must include a listing of the overall burden reduction associated with each initiative, the OMB numbers of affected collections, and an estimate of the amount of the total burden reduction associated with each collection. Your submission will not be considered complete with out this information.

While we ask you to discuss eGOV initiatives in a separate chapter of the ICB, you may cross list relevant items discussed under the eGOV section in your Initiatives Section provided they satisfy the criteria for burden reduction initiatives listed below.

2. **What is an appropriate initiative in response to this bulletin?** We ask you to identify up to three initiatives to improve program performance by enhancing the efficiency of information collections and to reduce paperwork burden on the public. We seek initiatives that:

- a. Improve program performance by enhancing the efficiency of agency information collections (both within the agency and, in the case of related information collection activities, among agency components or across agencies);
- b. Significantly reduce the burden per response on the public; or
- c. Lead to a comprehensive review of an entire program (both within the agency and, in the case of related information collection activities, among agency components or across agencies), including regulations and procedures.

**Please Note:** Initiatives **MUST NOT** consist of methodological changes in the manner by which agencies estimate burden.

3. **What information about these initiatives must we submit?** We ask that your submission include:

- a. A complete and concise description of the programs that you will be affecting, including statutory and regulatory citations, a description of the affected public, and the agency structure that implements the program (both within the agency and, in the case of related information collection activities, among agency components or across agencies).
- b. Measurable objectives you expect to achieve through this initiative which must include estimates of expected burden reduction linked to specific collections which will be effected (the total estimated burden reduction for each initiative must be broken out by collection).
- c. Proposed timeline for actions that you will take.
- d. Perceived difficulties in accomplishing this initiative, including statutory or policy barriers.

**4. How should I report this information?** You should use Microsoft Word and follow the format below for each initiative:

Agency:

Initiative Title:

Description: (The Description should consist of one concise paragraph clearly summarizing the initiative)

Total Estimated Burden Reduction:

Collections Affected: (Collections Affected must include OMB Numbers, Collection Titles, and the estimated level of burden reduction associated with each item.)

Expected Date of Completion:

Potential Hurdles to Completion:

**INFORMATION COLLECTION BUDGET (ICB)**

1. **What is the purpose of this Appendix?** This appendix explains what information you will need to gather from within your agency to develop your Information Collection Budget (ICB) submission for FY 2005 and what you must submit to OMB.
  - a. Part 1 discusses how you should begin working on your ICB submission and offers general ideas we would like you to keep in mind.
  - b. Part 2 describes how to complete a chart which lists all of the transactions that affected your burden totals for FY 2004 and a chart that lists all of the expected transactions which you used to estimate your FY 2005 total burden.
  - c. Part 3 describes how to complete a chart showing the changes in your agency's total burden from FY 2003 to FY 2004, broken down into different kinds of program changes and adjustments.
  - d. Part 4 instructs you to describe a limited number of significant examples of your agency's paperwork reductions and increases for FY 2004 and planned reductions and increases for FY 2005, grouped by how or why the change occurred.

## Part 1: Preparation

### 1. What do I need to know before I start working on the ICB submission?

- a. **Burden Reduction Goals:** While the PRA does not specify a statutory burden reduction goal for FY 2004, you still need to make every effort to ensure that your agency will achieve the “maximum practicable” reductions given your agency’s statutory and programmatic responsibilities.
- b. **Categorizing Burden Changes:** To improve the quality of the information you provide to us and we provide to Congress and the public, we ask in Part 2 that you review the transactions that you review the transactions that occurred in FY 2004 and that you categorize these changes.

### 2. How do I begin working on this portion of the ICB? The ICB always contains a review of the previous fiscal year (FY 2004) and a look toward the next (FY 2005), with an emphasis on identifying significant changes in burden reduction.

It is important for you to work with the program officials in your agency to verify the information that we send to you and to appropriately classify all the changes in information collection activities in FY 2004. As part of this process, you should make sure that you have a clear understanding of whether any program change over 10,000 hours or \$10,000,000 represents a significant change to the burden imposed on the public. You should also make sure that program officials are working to resolve any outstanding violations.

To provide information for FY2005, it is also important to work with the program officials in your agency to identify all potential changes in information collection activities in FY 2005. Make sure you have, for each change, an OMB number (if assigned), the expected program change and/or expected adjustment for burden hours and costs. You will need this information to estimate your agency’s FY 2005 total hour burden.



## Part 2: A Comprehensive Accounting

3. **How is this accounting different than in previous years?** This year's instructions are similar to those contained in the FY 2002, FY 2003, and FY 2004 Bulletins. Specifically, you will need to break out for each transaction the following information:
- a. Net Program Change, which is the sum of:
    - i. Change in burden due to new statutory requirements (see below);
    - ii. Change in burden due to lapses in OMB approval (see below);
    - iii. Change in burden due to other agency actions; and
  - b. Adjustment (see below).
4. **How will I report information on each transaction?** We will provide to you Microsoft Excel files containing two tables similar to Figure 1. We will complete columns 1, 2, 6, and 7 for you. You will need to complete the rest of the table by dividing net burden changes into program changes due statutory changes, lapse of OMB approval, or Agency Action. You will also need to indicate the changes that will be identified and described as significant burden changes (See Part 4 of this Appendix). For each transaction, the following information goes in the following columns:
- a. Columns 1 and 2 present the OMB number and the date of the OMB Notice of Action, respectively. OMB will provide this information.
  - b. In column 3, the change in hour or cost burden due to changes in statutory requirements for each transaction (see question 8);
  - c. In column 4, the change in hour or cost burden due to lapses in OMB approval. Any transaction related to a violation- including expirations, reinstatements, and approvals – should be entered in this column. (See Question 9)
  - d. In column 5, the change in hour or cost burden due to program changes by the agency that were not attributed to statutory changes or lapses in OMB approval. (See Question 10);
  - e. Column 6 will be provided by OMB. The sum of entries in columns 3, 4, and 5 should equal the entry in column 6;
  - f. Column 7 will be provided by OMB, but you should verify the classification of the transaction and change accordingly:
  - g. In Column 8, an "X" should be placed for each "significant burden change" as described in Part 4 of this Appendix. There should not be an X used for any transaction identified in Column 4, Changes due to lapse of OMB approval.
  - h. In column 9, Notes, you **must** include a **concise** statement to indicate **any**

changes you make in the information provided by OMB. For example, if you reclassify a transaction from an adjustment to a program change, you should include a note stating “Data misclassified as adjustment.”

If a burden change is greater than 10,000 hours or a cost change is greater than \$10,000,000, and you do not provide an exhibit, you **must** also provide a concise statement in the Notes section. This will help streamline the review process for both the agencies and OMB. (See Question 13)

FY 2004 CHANGES IN BURDEN HOURS								
OMB #	Date	PROGRAM CHANGES			NET PROGRAM CHANGES	ADJUSTMENTS	EXHIBIT	NOTES
		Due to Statutory Changes	Due to Lapse of OMB Approval	Due to Agency Actions				
TOTAL		0	0	0	0	0		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
TOTAL		0	0	0	0	0		

FY 2004 CHANGES IN COST BURDEN (\$,000)								
OMB #	Date	PROGRAM CHANGES			NET PROGRAM CHANGES	ADJUSTMENTS	EXHIBIT	NOTES
		Due to Statutory Changes	Due to Lapse of OMB Approval	Due to Agency Actions				
TOTAL		0	0	0	0	0		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
TOTAL		0	0	0	0	0		

FIGURE 1

You should total columns 3 through 7 and enter the total at the bottom of each column

**Note: Cost burden is reported in thousands of dollars, just as in the OMB computer tracking system and on the OMB Form 83-I.**

- When can we attribute a program change to a new statutory requirement?** You should only attribute a program change to a new statutory requirement when the information collection directly related to a statute enacted within the last five years (i.e. after January 1, 1999). This should not include increases in burden due to long-standing statutory mandates or recurring statutory requirements. You may, however, include changes if this is the first time your agency is implementing a statute that has been law for many years. Please consult your OIRA desk officer if you are uncertain

6. **What changes in burden should be listed under lapses of OMB approval?**

You should list under this category any change in burden that occurred when:

- a. your agency allowed an OMB approval for a collection to expire even though your agency continued to conduct or sponsor the collection; or
- b. OMB approved a collection that your agency has been conducting or sponsoring without prior OMB approval.

Your response to this section **must** include **all** transactions – expirations, reinstatements, or approvals – related to the violations reported to OMB.

Do not include collections that your agency has discontinued and for which OMB approval has expired. These changes should be listed as changes due to other agency actions.

7. **What changes in burden should be listed as changes due to other agency actions?**

Under this category, you should list any other program changes that do not result from statutory obligation or a lapse in OMB approval. For example, if you eliminated a form or streamlined an information collection, the reduction should be listed as due to other agency actions.

This category should also include intentional expirations and discontinued collections. For example, if you allowed a collection to expire or discontinued a collection because a program has been completed (e.g. a one time survey), the transaction should be listed as due to other agency actions.

This category may include reinstatements, but only if the reinstatements are not related to violations.

8. **What changes in burden should be counted as adjustments?** Adjustments are changes that do not affect the content of the information your agency collects or how it is collected. These changes may be due to factors over which your agency has no control such as population growth or economic expansion.

**Example:** If burden increased because your agency took an action to collect information from a new segment of the economy, you should classify it as a **program change**. If, instead, burden went up because more businesses entered a segment of the economy from which your agency already collected information, you should classify it as an **adjustment**.

**Example:** If you reported an increase in burden because your agency changed the way it estimates burden, you should classify it as an **adjustment**.

- 9. How do I report to OMB transactions that we expect will affect burden during FY2005?** You should report every transaction that you expect will affect burden during FY 2005 in two tables in formats similar to Figures 1 and 2, excluding column 2 (Date). Please list expected transactions in order by OMB number. List new collections not yet assigned an OMB number at the bottom of the list with the appropriate four digit prefix. We will provide empty Excel charts to complete along with the information for FY 2004.
  
- 10. Do I need to provide an entry for every transaction we expect during FY 2005?** No, you only need to provide an entry for transactions that will affect your total burden for FY 2005.

### Part 3: Aggregate Burden Totals

11. **How do I report aggregate burden totals for FY 2004?** Complete a table similar to that shown in Figure 2, which we will provide as part of the Microsoft Excel spreadsheet file that we provide to complete Part 2. OMB will provide you with numbers for fields 9,3,4,5, 6, 7, and 10.

Field 9 represents the total burden we reported for your agency last year, **do not change field 9 under any circumstances**. The numbers in fields 3, 4, 5, 6, and 7 will be based on the information you submit to OMB. The spreadsheet you receive will contain links to the totals from the spreadsheet on individual transactions for the Fiscal year (See Figure 1, Appendix B). Totals from Columns 3, 4, 5, 6, and 7 of Figure 1, Appendix B should equal fields 3, 4, 5, 6, and 7 in Figure 2. The number in row 10 should be equal to the sum of items 9, 6, and 7.

As part of this process, you must make sure that the number in row 10 corresponds to the numbers provided to you at the end of the Fiscal Year as part of the monthly inventory of information collections. If there are discrepancies between your agency's records and our database, you will need to work with your OIRA desk officer to determine the cause of the discrepancy and the appropriate remedy.

12. **How do I report expected aggregate burden totals for FY 2004?** Again, use the information you collected for FY 2004 in Part 2 to complete the corresponding cells in Figure 2. Add the aggregate burden total for FY 2003 to the expected net program change for FY 2004 and the expected net adjustments for FY 2004 to get an expected aggregate burden total for FY 2004.

SUMMARY TABLE OF BURDEN CHANGES		Burden Hours (millions)	Cost Burden (\$,000,000)
<b>FY 2003 Total Burden</b>		9	
	FY 2004 Program Changes Due to New Statutes	3	
	FY 2004 Program Changes Due to Lapses in OMB Approval	4	
	FY 2004 Program Changes Due to Agency Actions	5	
SUBTOTAL: FY 2004 Total Program Changes		6	
FY 2004 Adjustments		7	
<b>FY 2004 Total Burden</b>		8	
	Expected FY 2005 Program Changes Due to New Statutes		
	Expected FY 2005 Program Changes Due to Lapses in OMB Approval		
	Expected FY 2005 Program Changes Due to Agency Actions		
SUBTOTAL: Expected FY 2005 Total Program Changes			
Expected FY 2005 Adjustments			
<b>Expected FY 2005 Total Burden</b>			

FIGURE 2

## Part 4: Examples of Significant Burden Changes

13. **What does “significant” mean?** Significant burden reductions are those that demonstrate the agency’s adherence to the principles of the Paperwork Reduction Act and have a meaningful impact on the burden imposed on the public. Significant burden increases are generally those that have attracted attention and/or have a meaningful impact on the public. We request that you limit discussion to program changes of 10,000 hours and/or \$10,000,000 or greater. If you do not provide an exhibit for a change of 10,000 hours and/or \$10,000,000 or greater, you must provide a concise note, in the Notes section of the spreadsheet (See Figure 1).

**Significant burden changes do not include adjustments, only program changes.** In addition, please do not provide exhibits for the following types of burden changes, **regardless of their burden:** Elimination of pilot programs, completion of one time surveys or changes in burden associated with ongoing cyclical surveys or merged collections under a new OMB number where there has been no change in burden.

14. **What kinds of burden reductions and increases should I describe?** We are splitting information on program changes into several categories. Please assign each change to only one of the following categories. If two or more categories could apply to a single change; select the category that is most appropriate.

- a. Burden reductions should be placed into one of the following six categories.

**Changing Regulations:** reducing information collection burden by revising existing regulations to eliminate unnecessary requirements or by completely changing the way you regulate;

**Cutting Redundancy:** reducing information collection burden by raising reporting thresholds to reduce the number of reports that need to be submitted, cutting the frequency of periodic reporting requirements, consolidating information collections, or working together with other agencies to share information across programs;

**Changing Forms:** reducing burden by simplifying and streamlining forms, making them easier to read and fill out and by making programs easier to apply for;

**Using Information Technology and E-Government:** reducing burden by putting in place electronic systems that can speed the exchange of information between the government and the public and allow respondents to use their own information technology to ease reporting burdens;

**Statutory Reductions:** reducing burden because of recently enacted statutes; and

**Other:** reducing burden through other agency efforts.

- b. Burden increases should be placed into one of the following two categories:

**Statutory Increases:** Increasing burden due to new statutory requirements (see question 6 for more information; and

**Other:** Increasing burden due to other factors.

**15. What information do I need to describe these changes?** At a minimum you will need:

- a. title of the collection and/or title of the initiative;
- b. one to two sentences description of the purpose of the collection (including from whom you collect the information, what information you collect prior to the change, and, if the collection is not a recordkeeping requirement or a third-party disclosure, how your agency uses the information collected);
- c. a short concise description of what is/was changed, how it affected burden, and if part of a broader agency initiative;
- d. the change in burden (hours and costs, program changes only);
- e. for statutory increases and reductions, the full name of the statute and public law number; and
- f. whether the initiative reduced paperwork burden on small entities with fewer than 25 employees.

**16. How should I report this information?** Use the format below for FY 2004. Repeat for FY 2005. Microsoft Word or WordPerfect are the preferred formats. **We will not accept entries in Microsoft Access.** Each entry should be no more than 100 words and should be in plain language understandable to a member of the public not familiar with your programs. Avoid the use of acronyms or “jargon.” For your convenience, we will provide a copy of those entries included in last years ICB for FY 2004. You may use those for this year. However, we ask that you please verify that the information is correct. **Do not change the format of the entries.**

**Please use Times New Roman, 12 point. We will not accept entries in a table or chart form.**

**Please organize and categorize the exhibits in the following manner:**

**2004 Changes in Burden**

**Reductions:**

**Change in Regulations  
Cutting Redundancy  
Changing forms  
Using IT  
Statutory Reductions  
Other**

**Increases:**

**Statutory Increases  
Other**

**2005 Changes in Burden**

**Reductions:**

**Change in Regulations  
Cutting Redundancy  
Changing forms  
Using IT  
Statutory Reductions  
Other**

**Increases:**

**Statutory Increases  
Other**

**In each category, please report the information in the following order for each exhibit:**

**OMB Number:**

**Title:**

**Purpose of the Collection:**

**How Reduction Achieved:**

**Change in Burden:**

- 17. May I include more than one example for each category? Do I need to include one example for each category?** You may include more than one example under each category, but you should try to have at least one example for your agency in each category. Do not include any examples more than once. Please try to limit the total number of examples to 15 per fiscal year.
- 18. How does this tie in to the charts in Part 2?** For each example, identify the corresponding transaction in the charts for Part 2 by placing an “X” in column 8. If there is a burden change of 10,000 hrs and/or \$10,000,000 or greater and it is not a change due to a violation and you are not providing an exhibit please provide a short note (e.g. elimination of one time survey).