July 2023

Tackling the Time Tax

How the Federal Government Is Reducing Burdens to Accessing Critical Benefits and Services

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Preface

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More frightening than having cancer — twice."

That is how an individual with a disability described their experience of completing the forms necessary for recertifying their eligibility for disability insurance benefits during a public listening session with the Office of Information and Regulatory Affairs (OIRA).

The ordeal they described—confusing notices, complicated questions, and underlying it all, the deep anxiety of potentially losing life-saving assistance—is part of what are called "administrative burdens." These include the time, money, and psychological costs involved in interacting with government. Forms and other information collections are an essential part of how Americans seek support from the government—but too often paperwork burdens like these end up serving as a tax on the time and well-being of individuals seeking assistance. And while reducing paperwork burdens matters for all Americans, we also know that those most in need of government assistance are often those least able to navigate complex forms or processes, so time taxes and burdens entrench social and economic disparities across underserved communities.

OIRA, working with our Federal agency partners, has a unique responsibility under the law for ensuring that many of the most common touchpoints with the public—the forms they complete in their interactions with government—are minimally burdensome on the public. Under the Paperwork Reduction Act of 1995 (PRA), Congress made OIRA responsible for "minimiz[ing] the Federal information collection burden, with particular emphasis on those individuals and entities most adversely affected."[1]

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1. Pub. L. No. 104-13 (1995) (codified at 44 U.S.C. §§ 3501–3520); quoted in 44 U.S.C. §3504(c)(3).

To further this goal, last year OIRA launched a new initiative to reduce burdens in accessing public benefits and services across the Federal government. As part of that initiative, the Office of Management and Budget (OMB), and within it, OIRA, issued government-wide guidance to agencies on *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act* (M-22-10)[2]. This guidance directed agencies to improve their analysis of burdens experienced by the public when navigating Federal forms associated with public benefits and services, including through expanded consultation with the public. The guidance also calls on agencies to use this improved analysis to consider reforms that can make it easier for the public to access essential services. In short, OIRA is using our authorities under the PRA to engage with agencies about their design of forms, as well as broader regulatory and process steps that they can take to make interacting with government simpler.

Earlier this year, OIRA asked agencies to share how they were advancing the burden reduction initiative and implementing OIRA's burden reduction guidance.[3] This report represents OIRA's first public summary of the burden reduction initiative, exploring in detail some of the most significant burden reduction work undertaken by the Federal government since the start of the Biden-Harris Administration.

OIRA received over 100 responses from 20 agencies. From these initial submissions, OIRA is highlighting 16 agency initiatives in this report. These initiatives will affect millions of individuals, families, and small businesses, including 18 million students and parents completing financial aid forms, hundreds of thousands of disabled beneficiaries, some 26,000 farmers taking out direct loans from the Federal government annually, and over 25,000 Veteran-owned small businesses.

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2. OMB Memorandum M-22-10, *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act*, April 13, 2022: https://www.whitehouse.gov/wp-content/uploads/2022/04/M-22-10.pdf.

3. OMB Memorandum for Chief Data Officers, *Data Call for the FY 2022 Information Collection Budget*: https://www.whitehouse.gov/wp-content/uploads/2023/05/2022-ICB-Data-Call.pdf.

As described in greater detail in this report, one of those initiatives addresses the stressful experience told to OIRA in our listening session by a Social Security disability benefit recipient. In response to this and other similar feedback, the Social Security Administration launched a reformed recertification process that involved many of the leading practices of burden reduction. For instance:

- The paper form **was shortened** by 20%;

- The relevant form now allows many beneficiaries to **complete the process online** instead of through mailed paper forms;

- The online form uses data already on-file to **automatically populate** the medical history portion of the form;

- The form includes revised questions to expand the use of **plain language** and provides numerous clarifying instructions;

- The form **now excludes questions** that public commenters had identified as confusing, burdensome, and likely to generate inaccurate responses; and,

- All of these measures were pursued based on **extensive public engagement** including nearly 100 public comments on the form itself as well as 30 usability sessions with beneficiaries and other stakeholders.

I am proud of agencies' work and OIRA's support of these initiatives—and even more, for the impact that these initiatives will have reducing the time tax that so many individuals, families, and small businesses face.

These initiatives are part of OIRA's broader effort to modernize the regulatory review process, including to ensure that our regulations advance equity and reflect public engagement with the communities that we're serving. These initiatives are thus consistent with the Biden-Harris Administration's historic commitment to equity. These initiatives are also

an important way that OIRA is contributing to President Biden's focus on improving customer experience and the delivery of government services. And they're an important part of the Administration's commitments to showing how democracy can deliver for the American people by addressing their everyday needs.

In the coming year, our team looks forward to continuing to work closely with Federal agencies on implementing high-impact burden reduction measures and identifying additional measures to pursue through ongoing engagement with impacted communities.

I look forward to reporting on our progress in the months and years to come.

Richard L. Revesz
Administrator, Office of Information and Regulatory Affairs
Office of Management and Budget
Executive Office of the President

Executive Summary

By one estimate, every year more than $140 billion in government benefits that Congress has authorized goes unclaimed — including tax credits for working families, health insurance coverage for low-income adults and children, unemployment benefits, and disability supports.[4] For instance, in recent years only about half of the women, infants, and young children eligible for nutrition assistance from the U.S. Department of Agriculture actually received that critical support.[5] In a similar vein, many small businesses that could qualify for tax credits do not claim them.[6] These unclaimed benefits increase material insecurity, make it harder for small businesses to grow, make it harder for families to climb out of poverty, and undermine our country's economic potential.

One important reason why members of the public do not take advantage of government programs for which they may be eligible are administrative burdens — costs like the "time tax" required to learn about a program, fill out paperwork, assemble required documents, and schedule visits to government offices.[7] For some families or small businesses, these burdens keep them from accessing much-needed benefits altogether. Others may succeed in accessing benefits — but pay a heavy cost through lost time, additional stress, stigma, or more.

These costs do not just carry economic consequences; they also sap Americans' trust in the ability of government to meet their basic needs or operate efficiently or fairly. And stigmatizing interactions that individuals may have with the government — from unnecessary trips back-and-forth to government offices

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4.   Estimate reported in Matthew Desmond. 2023. *Poverty, by America*. New York: Crown Press, page 241.

5.   Department of Agriculture. 2023. "National and State Level Estimates of WIC Eligibility and Program Reach in 2020." https://www.fns.usda.gov/wic/eligibility-and-program-reach-estimates-2020.

6.   See for instance: Alex Muresianu and Garrett Watson. 2021. "Reviewing the Federal Tax Treatment of Research & Development Expenses." Tax Foundation: https://taxfoundation.org/research-and-development-tax/.

7.   "Time Tax" as referred to in Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government (E.O. 14058, December 13, 2021): https://www.whitehouse.gov/briefing-room/presidential-actions/2021/12/13/executive-order-on-transforming-federal-customer-experience-and-service-delivery-to-rebuild-trust-in-government/.

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to intrusive questions on forms — make it less likely that those individuals will engage in other aspects of civic life.[8]

All too frequently these burdens fall unequally across the population. Those families or small businesses that are already struggling — and who may face discrimination, exclusion, or marginalization — tend to also bear the largest burdens and time taxes. Families with irregular wages due to unemployment may have a harder time documenting their income than families with steady employment. Workers with multiple, part-time jobs may face higher barriers in taking time off to visit a government office in the middle of the day compared to workers with more predictable schedules. Small businesses, often family run, may not have staff to focus on completing the paperwork necessary for government loans or contracts.

For all these reasons, reducing burdens across public benefits and services is a central priority for the Biden-Harris Administration, as well as a central priority for the Office of Information and Regulatory Affairs (OIRA) in the Office of Management and Budget (OMB). Through its implementation of the Paperwork Reduction Act (PRA), OIRA is charged with ensuring that the Federal government minimizes the burdens that fall on members of the public through government forms.[9]

In 2022, OIRA announced a new initiative to use its authority under the PRA to (1) more accurately estimate all of the different burdens faced by the public and (2) work collaboratively with Federal agencies to reduce those burdens. OIRA launched this initiative with the publication of Federal government-wide guidance to agencies in April 2022 and an accompanying memo in December 2022.[10] OIRA has been working closely with agencies to identify and implement burden reduction opportunities in ongoing regulations and forms and foster the sharing of leading practices, lessons, and tools for reducing burdens across the Federal government.

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8.   For a review, see: Suzanne Mettler. 2018. *The Government-Citizen Disconnect*. New York: Russell Sage Foundation Press.; Jamila Michener. 2018 *Fragmented Democracy: Medicaid, Federalism, and Unequal Democracy*. New York: Cambridge University Press.

9.   44 U.S.C. §3504(c)(3).

10.   OMB Memorandum M-22-10, *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act*, April 13, 2022: https://www.whitehouse.gov/wp-content/uploads/2022/04/M-22-10.pdf.; OMB-OIRA Memo, *Strategies for Reducing Administrative Burden in Public Benefit and Service Programs*: https://www.whitehouse.gov/wp-content/uploads/2022/12/BurdenReductionStrategies.pdf.

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In this report, we summarize over 100 burden reduction initiatives across 20 Federal agencies. Further, we provide complete descriptions of six significant burden reduction initiatives that use the leading practices OIRA outlined in our guidance. These are:

- The **Department of Labor**'s efforts to improve timely and equitable access to unemployment insurance benefits through the use of plain language, information technology and process improvements, and partnership with trusted community intermediary organizations through the Department's Unemployment Insurance Modernization Initiative.

- The **Department of Agriculture**'s efforts to simplify and streamline applications for Federal loans for farmers who cannot otherwise secure credit to start or maintain their farms through the Department's Loan Assistance Initiative.

- The **Social Security Administration**'s efforts to simplify and streamline recertification of disability status (also known as Continuing Disability Review), making it easier for individuals with disabilities to maintain access to critical Social Security supports.

- The **Department of Education**'s efforts to simplify and streamline the option of discharging student loan debt for disabled borrowers, including through automated eligibility determinations through the Department's Totally and Permanently Disabled Borrowers Debt Discharge Initiative.

- The **Department of Housing and Urban Development**'s efforts to simplify and streamline how recipients of housing assistance verify their incomes, assets, and other elements necessary for demonstrating eligibility for housing assistance through the Housing Opportunity through Modernization Act implementation.

- The **Department of Homeland Security**'s successful commitment to reduce 20 million hours of paperwork burden on the public across all of its programs.

The report also highlights another seven specific initiatives achieving significant burden reduction, as well as three cross-cutting agency initiatives embedding burden reduction values across their agencies' workforces.

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While every agency is addressing burden reduction in ways tailored to their own programs, applicable laws, and the communities they are serving, OIRA has identified common strategies that agencies have used successfully. Agencies should consult with their counsels in pursuing such strategies, which include:

· Automatically making individuals or families eligible for one program based on those individuals' or families' eligibility for a related program;

· Reducing the need for individuals to produce additional documentation or paperwork to continue receiving benefits or services;

· Simplifying forms, including by using plain language, eliminating unnecessary questions, and allowing online form submission;

· Using data agencies may already have on file to reduce the amount of information requested of individuals or families, including by sharing data among different government agencies, as appropriate;

· Partnering with community-based organizations to provide information or assistance about how to apply for benefits and services; and

· Providing government services and benefits in more languages tailored to local community needs.

OIRA is eager to work with agencies in the coming months and years to expand use of these strategies across more agency programs. This report represents one step towards a Federal government that provides the benefits and services that members of the public need with minimal hassle, time, and burden — and in doing so, supports a more responsive democracy.

The rest of this report proceeds as follows. In Section 1, we describe the different burdens and time taxes that exist across Federal programs, the weight of these costs, and their often-unequal impact across the public. In Section 2, we describe OIRA's burden reduction effort and how it supports other OIRA and Administration priorities, including modernizing regulatory review. In Section 3, we take stock of new burden reduction successes across Federal agencies, describing the steps that agencies took and the impact burden reduction had. Section 4 concludes by describing the next steps for OIRA's burden reduction work.

What Is "Burden" and Why Does It Matter?

What Is "Burden" and Why Does It Matter?

What are administrative burdens and time taxes?

Across Federal benefit and service programs, there is often a substantial gap between the population of individuals eligible for benefits and services and those actually receiving benefits and services. For instance, recent studies suggest that slightly less than half of adults eligible for health insurance benefits through Medicaid actually received those benefits.[11]

Past research indicates that *administrative burdens* can play an important role in explaining why participation rates are higher in some states and programs compared to others. This includes the costs associated with learning about, applying for, and using public services and benefits, and encompasses what some have called the "time tax" that individuals, families, and small businesses face when accessing public benefits and services.[12]

Administrative burdens also impose substantial financial, time, and psychological costs on individuals who succeed in applying for and ultimately receiving public benefits. During the height of the COVID-19 public health emergency in 2020, for example, backlogs, limited staff, and outdated information technology infrastructure meant that many unemployed workers encountered long wait times to process their unemployment insurance applications.[13] These delays caused psychological stress and financial uncertainty for households experiencing job loss — even for workers who were successful in qualifying for benefits.[14]

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11.   Sandra Decker et al. 2022. "Eligibility for and Enrollment in Medicaid Among Nonelderly Adults After Implementation of the Affordable Care Act." *Medical Care Research Review* 79(1).

12.   For summaries of the relevant research, see especially: Wonsik Ko and Robert A. Moffitt. 2022. "Take-Up of Social Benefits." National Bureau of Economic Research Working Paper 30148.; Janet Currie. 2006. "The Take-Up of Social Benefits." Published in Alan Auerbach et al. (eds) *Public Policy and the Income Distribution*. New York, NY: Russell Sage Foundation Press.; Pamela Herd and Donald P. Moynihan. 2018. *Administrative Burden: Policymaking by Other Means*. New York, NY: Russell Sage Foundation Press.

13.   Gregory Acs and Michael Karpman. 2020. "Employment, Income, and Unemployment Insurance during the COVID-19 Pandemic Findings from the May 14–27 Coronavirus Tracking Survey." Urban Institute: https://www.urban.org/sites/default/files/publication/102485/employment-income-and-unemployment-insurance-during-the-covid-19-pandemic.pdf.

14.   Rakeen Mabud et al. 2021. "Foundations for a Just and Inclusive Recovery." Color of Change, National Employment Law Project, TIME'S UP Foundation, and the Cornell Worker Institute: https://s27147.pcdn.co/wp-content/uploads/Foundations-for-Just-Inclusive-Recovery-Report.pdf.

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Researchers have identified at least four varieties of administrative burdens that create barriers for individuals accessing public programs and services — from food assistance to drivers' licenses — in a timely manner. These include:

- **Informational and learning costs**, which refer to the time, effort, money, and other resources that individuals need to expend to learn about the existence of a public service or benefit, rules governing their eligibility, and application, certification, benefits maintenance, and post-benefit reporting or recertification processes. *This could include the time it takes for an unemployed worker to read through dense and technical materials on their state's workforce agency website to learn about the application requirements for unemployment insurance.*

- **Compliance costs**, which refer to the time, effort, money, and other resources that individuals need to expend to follow through with program application, certification, or recertification, including filling out necessary paperwork, waiting for correspondence from program agencies, planning for in-person meetings, and producing documentation to confirm their eligibility (for instance, records of household composition, income, assets, or health status). *This could include the time, lost wages, and childcare costs involved in a person having to make an in-person visit to a nutritional assistance clinic as required as part of nutritional assistance benefit application and recertification processes.*

- **Psychological costs**, which refer to the cognitive load, discomfort, stress, anxiety, distrust, or loss of autonomy or dignity that individuals may experience as a result of attempting to apply for, and access, a public benefit or service. *This could include stigmatizing and intrusive questions that program administrators might ask applicants to cash assistance programs as part of Temporary Assistance for Needy Families to gauge their compliance with "behavioral requirements" for the program, including about their children and romantic partners.*

- **Redemption costs,** which refer to the time, effort, money, and other resources that individuals need to expend to use public benefits or services where beneficiaries or participants must navigate third-party agents or vendors. *This could include the time, knowledge, and effort that families need to expend to figure out which health care providers accept their Medicaid benefits and what services are covered.*

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Why do administrative burdens and time taxes matter?

Paperwork is policy. Administrative burdens can play an important role in explaining why so many individuals, families, and small businesses fail to receive the Federal government benefits and services for which they may be eligible. This matters because when individuals and families fail to receive the benefits to which they are entitled, it can leave them without much-needed economic support, keeping those families in challenging circumstances and impeding opportunities for their economic mobility. Similarly, when small businesses miss out on potential financial assistance or business opportunities with the Federal government, it hampers their ability to grow. Together, these program take-up gaps not only harm individual households and small businesses, but can negatively affect the economy overall.

Consider findings across a number of social programs that providing access to benefits for pregnant women and young children can have long-term benefits for productivity, economic self-sufficiency, and physical health when children reach adulthood. For instance, poor children who received nutrition assistance when they were very young or whose mothers received assistance when pregnant were much more likely to have higher levels of formal education, be employed in professional occupations, be above the poverty line, be physically healthier, and live longer as adults compared to poor children who did not receive such benefits.[15] Shutting families out of important public benefits like these because of administrative burdens and time taxes leaves our society poorer, less healthy, and less productive.

Administrative burdens can also erode the trust that individuals and communities have in the Federal government, undermining our collective sense of civic engagement. A growing body of research documents how stigmatizing interactions with the government — for instance, being unable to access much-needed benefits or experiencing demeaning or intrusive services or processes — leaves individuals with lower levels of trust in government and makes individuals less likely to participate in the civic process.[16] Tackling administrative burdens and time taxes can help rebuild trust in government and show how democracies can deliver for their citizens.

15.   Martha J. Bailey et al. 2022. "Is the Social Safety Net a Long-Term Investment? Large-Scale Evidence from the Food Stamps Program." National Bureau of Economic Research Working Paper No. 26942.

16.   For a review, see: Suzanne Mettler. 2018. *The Government-Citizen Disconnect*. New York: Russell Sage Foundation Press.; Jamila Michener. 2018 *Fragmented Democracy: Medicaid, Federalism, and Unequal Democracy*. New York: Cambridge University Press.

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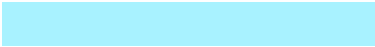
The unequal burden of administrative burdens

Administrative burdens and time taxes touch many individuals who interact with government. One recent study by the Urban Institute asked adults who had applied for, or participated in, large safety net programs in the past year whether they reported difficulty in accessing benefits, including difficulties determining their eligibility, providing required documentation or completing paperwork, or not getting benefits as soon as they needed. As the table below summarizes, large percentages of applicants and beneficiaries across social programs reported experiencing administrative burdens. In fact, this study undercounts the prevalence of administrative burdens given that it does not include individuals who were deterred from applying for benefits altogether.

Share of Adults Reporting Enrollment Difficulties, Among Those Whose Families Applied for or Participated in Safety Net Programs in the Past 12 Months (December 2021)

Social Program	% Reporting Difficulty with Enrollment
Supplemental Security Income	28%
Medicaid and Children's Health Insurance Program	28%
Social Security Disability Insurance	29%
Rental assistance	32%
Supplemental Nutrition Assistance Program (SNAP)	41%
Cash assistance	43%
Unemployment Insurance	46%

Notes: Excerpted from Marla McDaniel et al. 2023. "Customer Service Experiences and Enrollment Difficulties Vary Widely across Safety Net Programs." Urban Institute: https://www.urban.org/research/publication/customer-service-experiences-and-enrollment-difficulties.

Although administrative burdens and time taxes affect many of us — from applying to programs like those listed above to trying to renew a passport or driver's license — research suggests that the weight of administrative burdens and time taxes does not fall equally across the population. Instead,

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administrative burdens tend to fall on already-disadvantaged or underserved individuals, exacerbating the obstacles those individuals face to full inclusion and participation in our economy, society, and democracy.[17]

For instance, the Urban Institute study described above found that Hispanic individuals experienced much higher rates of difficulty in accessing major social programs like the Supplemental Nutrition Assistance Program (SNAP) and Medicaid.[18] Hispanic individuals were about 22% more likely than white individuals to have reported enrollment difficulties in SNAP. In a similar vein, individuals with disabilities and mental health conditions also reported considerably higher burdens to accessing Medicaid and the Children's Health Insurance Program and SNAP than did individuals without a disability or a diagnosed mental health condition. Another study examined administrative burdens in access to Medicaid for poor children, and found that policies that created administrative burdens — for instance, policies increasing the frequency of income verification for Medicaid eligibility — had different effects across the population of Medicaid-eligible children. Children without a college-educated parent, Hispanic children, and children with a non-citizen parent all were much more likely to lose Medicaid coverage after encountering these burdens than were children from families with a college-educated parent, non-Hispanic children, or children whose parents were both citizens. This suggests that administrative burdens often exacerbate existing disparities, including along racial, ethnic, social, and economic lines — and that tackling administrative burdens is an essential part of the Administration's efforts to promote equity and better support underserved communities.

Balancing burden reduction and program integrity

Efforts to reduce administrative burdens are sometimes cast in tension with the goal of maintaining program integrity — that is, ensuring that the government delivers benefits and services only to eligible individuals, families, and small businesses. By making it easier for individuals to claim benefits or services, this argument goes, the government may inadvertently deliver benefits or services to ineligible individuals, undermining the integrity of the program and costing taxpayers with wasted dollars and government staff time.

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17. Findings of this work were summarized in OMB's Study to Identify Methods to Assess Equity, a report submitted to the President in July 2021 as directed by Executive Order 13985: https://www.whitehouse.gov/wp-content/uploads/2021/08/OMB-Report-on-EO13985-Implementation_508-Compliant-Secure-v1.1.pdf.

18. Marla McDaniel et al. 2023. "Customer Service Experiences and Enrollment Difficulties Vary Widely across Safety Net Programs." Urban Institute: https://www.urban.org/research/publication/customer-service-experiences-and-enrollment-difficulties.

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In any form or service, some burdens are necessary.[19] Maintaining government program integrity is a critical goal, as is preventing fraudulent or wasteful government spending. But reducing administrative burdens, ensuring program integrity, and preventing wasteful spending can go hand-in-hand, especially when the burdens being eliminated do not meaningfully contribute to program integrity or require more government or private sector staff time and money to implement.

In many cases, agencies can reduce burdens without compromising program integrity, as in the case of removing documentation requirements or burdensome form questions that do not meaningfully assess program eligibility. The case of Social Security Continuing Disability Review is one example; the Social Security Administration (SSA) eliminated essay-style questions that public commenters had identified as particularly confusing. SSA also helped refine the form to emphasize the agency's responsibility to gather records from medical providers, rather than from beneficiaries. This shifted the burden from beneficiaries to the agency while also likely improving the consistency and reliability of the information gathered.

In a similar vein, research on California's Supplemental Nutrition Assistance Program indicates that nutrition assistance beneficiaries are six times more likely to drop out of the program in the months when paperwork is required from them — yet at least half and perhaps up to three-quarters of these beneficiaries still appear to be eligible for benefits based on their incomes. This suggested that current paperwork processes are screening out large portions of otherwise eligible individuals (who further incur additional burdens and create additional costs on government when they reapply) rather than effectively screening out ineligible individuals.[20]

In other cases, agencies can reduce burdens and time taxes while *improving* program integrity. For example, using eligibility for one government program to establish eligibility for another program where appropriate — for example, where the relevant eligibility criteria overlap — can reduce information that individuals or families are required to provide themselves, reducing opportunities for errors

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19. Interestingly, efforts to *increase* program access can, at times, also inadvertently increase burden from forms. See, e.g. Jordan Kyle. 2023. "When policymakers add administrative burdens while expanding access." https://donmoynihan.substack.com/p/when-policymakers-add-administrative.

20. Matt Unrath. 2021. "Pushed out by paperwork: Why eligible Californians leave Cal-Fresh." California Policy Lab: https://www.capolicylab.org/wp-content/uploads/2021/02/Pushed-out-by-paperwork-why-eligible-Californians-leave-CalFresh.pdf.

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that could contribute to improper payments while also making it easier for eligible individuals to access the program. As the Department of Agriculture (USDA) has noted about their use of this form of cross-program eligibility ("adjunctive eligibility") for nutrition and food assistance programs, "adjunctive eligibility is one of the most important tools now used to address program integrity and access issues in a way that cuts across programs."[21] Similarly, efforts to convert forms or notices to plain language can help individuals complete those forms more accurately, reducing errors that might otherwise have been created by overly-complicated or technical language.[22]

In general, policymakers should be mindful of the risks that a program change might pose to program integrity — the risk of an ineligible individual erroneously receiving benefits — *as well as* the risk that a change might cause eligible individuals to lose access to the benefit or incur higher costs in accessing the benefit.

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21. Government Accountability Office. 2005. "Means-Tested Programs: Information on Program Access Can Be an Important Management Tool." Report to the Ranking Minority Member, Committee on the Budget, U.S. House of Representatives, page 38: https://www.gao.gov/assets/gao-05-221.pdf.

22. See for instance: Department of Labor. "Use plain language for claimant notices." https://www.dol.gov/agencies/eta/ui-modernization/claimant-notices.

Section 2

OIRA's Burden Reduction Initiative

OIRA's Burden Reduction Initiative

The Paperwork Reduction Act as a platform for burden reduction

Responding to the opportunities for reducing administrative burden identified in the previous section, OIRA launched a new initiative, beginning in 2022, to focus on streamlining access to public benefits and services among eligible individuals, families, and small businesses. This initiative began with issuance of Federal government-wide direction to agencies, as part of an OMB Memorandum published in April 2022, M-22-10, *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act*.[23] The guidance in that Memorandum relies on OIRA's role under the PRA to "minimize the Federal information collection burden, with particular emphasis on those individuals and entities most adversely affected."[24]

Under the PRA, OIRA has the responsibility of reviewing government forms (formally called "information collections"), including forms for applying for Social Security benefits, farm loan benefits, or Veterans' health care, just to name a few. The PRA further requires these "collections of information" to have a public consultation process in addition to OIRA review, giving members of the public an important platform for sharing their views on the burdens forms might pose to them.

As required by the PRA, Federal forms are reviewed by OIRA at least once every three years, and more frequently if agencies want to modify them. When agencies submit proposed forms to OIRA, they must prepare supporting material that describes the anticipated burden the form will pose to the public — including the anticipated time associated with completing the form and the number of people affected by the form. The agency must justify why collecting the information and the associated burden is necessary to implement their programs. Further, agencies must describe any steps taken to minimize the burden faced by the public while ensuring that the information collected is of sufficient quality for the purposes envisioned by the agency.

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23.   OMB Memorandum M-22-10, *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act*, April 13, 2022: https://www.whitehouse.gov/wp-content/uploads/2022/04/M-22-10.pdf.

24.   44 U.S.C. §3504(c)(3).

OIRA'S BURDEN REDUCTION INITIATIVE

The M-22-10 guidance stresses that when agencies submit forms to OIRA and the public for review that involve public benefits and services, agencies should document the beginning-to-end experience as understood from the perspective of an individual member of the public. This experience should encompass the time and cost of activities such as reading through notices, obtaining and submitting required documentation, printing paperwork, or travelling to a field office. This experience-mapping should carefully document existing burdens and how the proposed form would change those burdens. In addition, the M-22-10 guidance describes the importance of consulting with members of the public to identify burdens, especially through groups or organizations representing the individuals, families, or small businesses likely to be eligible for, or participating in, public programs. The M-22-10 guidance also calls on agencies to systematically reduce burdens to access their programs, and details a number of strategies that agencies can consider to do so — including changes to paperwork, regulations, design processes, policies, and more.

Since the publication of the M-22-10 guidance, OIRA has taken a number of steps to implement the framework established in that Memorandum. These activities include:

- Working collaboratively with agencies as part of the PRA form review process to identify opportunities for further burden reduction. *For example, OIRA recently worked with the Department of Agriculture to make it easier for farmers to accurately complete a form for a new program providing relief to farmers who had experienced discrimination in farm loans.*

- Working collaboratively with agencies as part of OIRA's role reviewing Federal regulations to identify opportunities to change underlying program rules to reduce burdens. *For example, OIRA recently worked with the Department of Health and Human Services to reduce burdens when utilizing Special Enrollment Periods in the Medicare program.*

- Developing tools and resources for Federal agencies to implement burden reduction strategies. *For example, in December 2022, OIRA published a research summary for agencies detailing a number of evidence-backed strategies for reducing administrative burdens that could apply to many different programs.*[25]

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25.   OMB-OIRA Memo, *Strategies for Reducing Administrative Burden in Public Benefit and Service Programs*: https://www.whitehouse.gov/wp-content/uploads/2022/12/BurdenReductionStrategies.pdf.

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- Creating a community of practice for Federal agency staff to foster a culture of burden reduction across the Federal workforce. *OIRA has launched an interagency working group that meets regularly to discuss agency experiences with burden reduction, including common barriers, promising practices, and shared resources.*

- Systematically cataloguing high-impact burden reduction initiatives across Federal agencies, as well as implementation of the M-22-10 guidance. *OIRA has asked for agencies to report on their high-impact burden reduction efforts as part of preparing this report.*[26]

Advancing Biden-Harris Administration priorities

Each of these strategies builds on OIRA's authority under the PRA to support agencies and engage with them about how paperwork, programs, and policies can minimize the burdens that members of the public face in accessing benefits and services. They also build on OIRA's role in coordinating the Federal regulatory review process, helping agencies to see where changes to underlying program regulations could support burden reduction efforts.

In this way, OIRA's burden reduction initiative supports broader Administration efforts around modernizing the regulatory review process. On his first day in office, President Biden charged OIRA with finding ways of promoting the "efficiency, transparency, and inclusiveness" of the regulatory process, and in particular, ensuring that regulations "appropriately benefit and do not inappropriately burden disadvantaged, vulnerable, or marginalized communities."[27] In April 2023, the President further called on OIRA to take additional steps to enhance the effectiveness of regulatory review, improve public participation in the regulatory process, and increase the transparency and inclusiveness of OIRA's engagement with the public.[28] The burden reduction initiative fits into the Modernizing Regulatory Review agenda outlined by President Biden as an important way that agencies can ensure that regulations advance equity

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26.   OMB Memorandum for Chief Data Officers, *Data Call for the FY 2022 Information Collection Budget*: https://www.whitehouse.gov/wp-content/uploads/2023/05/2022-ICB-Data-Call.pdf.

27.   Presidential Memorandum on Modernizing Regulatory Review (January 20, 2021): https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/modernizing-regulatory-review/.

28.   Executive Order on Modernizing Regulatory Review (E.O. 14094, April 6, 2023): https://www.whitehouse.gov/briefing-room/presidential-actions/2023/04/06/executive-order-on-modernizing-regulatory-review/.

OIRA'S BURDEN REDUCTION INITIATIVE

by appropriately benefiting and not burdening disadvantaged, vulnerable, or marginalized communities as agencies consider regulatory changes to benefit and service programs they administer. Burden reduction is also intertwined with OIRA's efforts to increase public participation and community engagement in the regulatory process, since successful burden reduction requires close engagement with members of the public to better understand the barriers that individuals, families, and small businesses face to access public programs and services.[29]

OIRA's burden reduction work seeks to deliver on foundational Biden-Harris Administration priorities, including to advance equity and transform Federal service delivery.[30] The President's most recent Executive Order on Further Advancing Racial Equity and Support for Underserved Communities calls on agencies to reduce administrative burdens as well as employ innovative approaches to meaningful engagement with underserved communities.[31] The five cross-agency Life Experience teams, as part of the work directed in the Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government, have several projects that involve close collaboration with OIRA, including those relating to streamlining cross-agency processes and forms.[32] And burden reduction also supports President Biden's commitment at the 2023 Summit for Democracy to demonstrate "that our democracy can still do big things and deliver important progress for working Americans."[33]

29.   Office of Information and Regulatory Affairs. "Broadening Public Engagement in the Federal Regulatory Process." https://www.whitehouse.gov/omb/information-regulatory-affairs/broadening-public-engagement-in-the-federal-regulatory-process/.

30.   Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government (E.O. 14058, December 13, 2021): https://www.whitehouse.gov/briefing-room/presidential-actions/2021/12/13/executive-order-on-transforming-federal-customer-experience-and-service-delivery-to-rebuild-trust-in-government/.

31.   Executive Order on Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (E.O. 14091, February 16, 2023): https://www.whitehouse.gov/briefing-room/presidential-actions/2023/02/16/executive-order-on-further-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/.

32.   Explore the designated Life Experiences and projects: https://www.performance.gov/cx/projects/.

33.   The White House. 2023. "Remarks by President Biden at the Summit for Democracy Virtual Plenary on Democracy Delivering on Global Challenges." https://www.whitehouse.gov/briefing-room/speeches-remarks/2023/03/29/remarks-by-president-biden-at-the-summit-for-democracy-virtual-plenary-on-democracy-delivering-on-global-challenges/.

Section 3

Agency Burden Reduction Initiatives

Agency Burden Reduction Initiatives

In the following section, we summarize burden reduction case studies across a number of agencies. These include detailed case studies for efforts at the Department of Labor, Department of Agriculture, Social Security Administration, Department of Education, Department of Housing and Urban Development, and the Department of Homeland Security; shorter case studies of efforts at the Department of State, Department of Agriculture, Department of Health and Human Services, Department of the Treasury, Department of Education, Small Business Administration, and U.S. Patent and Trademark Office; and brief case studies of three agencies — the Internal Revenue Service, Department of Veterans Affairs, and U.S. Agency for International Development — that have committed to agency-wide efforts to embed burden reduction into their day-to-day operations.

These case studies reflect efforts across a range of programs, encompassing safety net programs, common government transactions, and efforts to support innovation in small firms. These case studies reflect varying levels of collaboration between agencies and OIRA. In some cases, OIRA helped to develop the initiative in close partnership with the agency as part of a form or regulatory review. In other cases, OIRA is highlighting efforts that agencies have led largely on their own as part of OIRA's continuing work sharing leading burden reduction practices and tools across agencies. In all cases, however, these case studies exemplify broad potential impact on the public, use of evidence-informed burden reduction tactics and strategies, and public engagement and consultation to target burden reduction efforts. As set forth in OMB Memorandum M-22-10, OIRA will continue to work with agencies to "identify both short-term and long-term initiatives to minimize burden on the public" involving public benefit or service programs.[34]

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34. OMB Memorandum M-22-10, *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act*, April 13, 2022: https://www.whitehouse.gov/wp-content/uploads/2022/04/M-22-10.pdf, page 10.

AGENCY BURDEN REDUCTION INITIATIVES

CASE STUDY

The Process: Unemployment Insurance Applications (Department of Labor)

Streamlining the process of applying for and receiving UI benefits for eligible unemployed workers through plain language, partnerships with community organizations, translation, and more.

What Is the Federal-State Unemployment Insurance System?

Run as a partnership between individual states and the Department of Labor (DOL), the Federal-State Unemployment Insurance (UI) system offers benefits to workers who lose their jobs through no fault of their own. UI offers economic security to workers and their families and provides stimulus to the economy during downturns. The program was a critical lifeline during the COVID-19 pandemic, paying out benefits to 53 million Americans and keeping millions out of poverty.[35]

Although UI provides much-needed support to individual workers and the economy as a whole, many workers, especially from underserved communities, face barriers to applying for, and receiving, benefits in a timely manner. Many unemployed workers who might be eligible for benefits do not claim them due to lack of knowledge about the program. Although rates of application and recipiency increased during the pandemic, in 2022 the majority of individuals who lost jobs — the unemployed workers most likely to have qualified for benefits — reported that they did not receive benefits.[36] Looking over the past decade, workers from underserved communities, particularly workers of color and workers with lower levels of formal education, applied for and received UI benefits at lower rates than workers who were not from such communities.

35. Zachary Parolin and Megan A. Curran. 2020. "Monthly Poverty to Spike After Expiration of the CARES Act Unemployment Benefits." Columbia University Center for Poverty and Social Policy Fact Sheet, December: https://static1. squarespace.com/static/5743308460b5e922a25a6dc7/t/5fd90dcbd8d61d6dc-57f8aa3/1608060365522/Expiring-CARES-Act-Monthly-Poverty-Factsheet-CP-SP-2020.pdf.; Ben Zipperer. 2020. "Over 13 million more people would be in poverty without unemployment insurance and stimulus payments." Economic Policy Institute September 17: https://www.epi.org/blog/over-13-million-more-peo-ple-would-be-in-poverty-without-unemployment-insurance-and-stimulus-pay-ments-senate-republicans-are-blocking-legislation-proven-to-reduce-poverty/.

36. Bureau of Labor Statistics. 2023. "Characteristics of Unemployment Insurance Applicants and Benefit Recipients Summary." March 29: https://www.bls.gov/news. release/uisup.nr0.htm.

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While there are many reasons workers do not apply for benefits, some important factors include the complicated forms and processes that unemployed workers must complete to qualify for benefits, as well as outdated and strained information technology systems states have in place to process claims. These barriers create learning, compliance, and psychological costs for workers attempting to access benefits.

How Has Public Engagement Informed UI Burden Reduction Efforts?

DOL built on extensive engagement with the public, including unemployed workers, worker organizations, legal services organizations, state governments, and UI agency staff, to understand the barriers faced by workers in claiming benefits. DOL is working together with state UI agencies to take steps to address those barriers.

For example, DOL regularly convenes Claimant Advocate listening sessions with front-line advocates for unemployed workers (primarily legal service lawyers) every three weeks. These listening sessions provide DOL with candid feedback from the field about burdens placed on claimants throughout the process of applying for and receiving UI benefits. To date, worker representatives from 20 states have participated in this roundtable. Further, DOL has sent multi-disciplinary Tiger Teams into states to make recommendations for process improvements, and these teams have also interviewed front-line advocates to gain additional perspectives on the burdens in each state.

What Steps Is the Biden-Harris Administration Taking To Modernize the UI System To Reduce Burdens?

With support from the American Rescue Plan Act, the Biden-Harris Administration is taking a number of steps to make it easier for qualified unemployed workers to access unemployment benefits. DOL has awarded new equity grants to states that both improve program integrity and ensure that more eligible workers, and especially workers from underserved communities, can access benefits in a timely manner. As of June 2023, 42 states and jurisdictions have received funding for new information technology process improvements that advance equity; launch or improve translation services;

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foster better communication with workers and other civil society groups; engage in data analysis to understand relevant barriers; and undertake plain language communications efforts, among other focus areas.[37]

Separately, DOL has awarded grants to states to partner with community-based organizations to help more eligible workers, especially from underserved communities, navigate the application process, reduce the stigma around benefit receipt, and flag issues that state governments and DOL can jointly address. These "navigator grants" are supporting DOL and state governments to partner with frontline organizations with trusted relationships in specific communities to better understand and address barriers that those communities face to accessing benefits.[38]

Many UI forms and processes use technical terms to describe key concepts regarding eligibility and benefit amounts that can be difficult for potential applicants to understand. DOL is creating new plain language forms and processes to ease the process of applying.[39] Making it easier for workers to understand how to complete forms accurately can also speed up application processing, and reduce improper payments that are generated when claimants do not understand instructions. This will save state agency time and resources by reducing the need to follow up with applicants to correct information, and by reducing time spent on processing appeals for inaccurate benefit denials.

Together, these changes will help reduce *learning costs*, by making it easier for workers to understand how to apply, through both plain language communications and assistance from community or worker organizations; reduce *compliance costs* by simplifying the steps necessary to complete forms and speeding up processing of applications; and reduce *psychological costs* by partnering with community and worker organizations to spread awareness of the program and reduce the stigma of applying.

37. AIR. 2023. "Promoting Equitable Access to Unemployment Compensation Programs: Overview of State Equity Grants." https://oui.doleta.gov/unemploy/pdf/AIR_ARPA_StateEquityGrantsSummaryMemo_Final.pdf.

38. Department of Labor. 2022. "U.S. Department of Labor Awards More Than $18M in Grants to Address Disparities in Delivery of Unemployment Benefits, Services in 7 States." https://www.dol.gov/newsroom/releases/eta/eta20220610-0.

39. Kevin Parker. 2023. "The UI Lexicon Project: defining commonly used UI terms in plain language." https://www.dol.gov/agencies/eta/ui-modernization/blogs/ui-lexicon.

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CASE STUDY

The Form: Farm Service Agency Loan Applications (Department of Agriculture)

Cutting the time tax for farm loan applications in half through form simplification and online assistance tools.

What Are Farm Service Agency Loans?

The U.S. Department of Agriculture (USDA) Farm Service Agency offers loans to help farmers secure financing to start, expand, or maintain a family farm. These loans can be used for a wide range of purposes, including to purchase land, livestock, seed, and equipment; cover farm operating costs and family living expenses; and refinance certain debts associated with the farm. Currently, approximately 115,000 farmers who cannot otherwise obtain sufficient credit receive support from the U.S. Department of Agriculture. Last fiscal year, USDA received over 33,000 applications and approved over 23,000 of those applications.[40]

Despite the important role that these loans play for American agriculture, many farmers — and especially those from underserved communities — struggle to submit applications. An investigative report from National Public Radio estimates that approval rates for Black farmers' applications for direct farm loans were just 36% in 2022, the lowest of any racial or ethnic group.[41] White farmers, by comparison, had over 70% of their applications approved. The differences can be explained both by higher rates of applications being rejected among underserved communities, as well as higher rates of incomplete or withdrawn applications among those communities. Advocates for underserved farming communities explain that these farmers often struggle with a complicated application process that can be confusing and difficult to navigate.

40.   Department of Agriculture. 2023. "FY 2022 Funding Accomplishments." https://www.fsa.usda.gov/programs-and-services/farm-loan-programs/program-data/index.

41.   Ximena Bustillo. 2023. "In 2022, Black farmers were persistently left behind from the USDA's loan system." National Public Radio: February 19, 2023.

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Overhauling the Loan Application and Creating a New Online Tool

USDA revised its direct loan program application, which began as a combination of 10 different forms with 29 pages of paperwork, estimated to take 5 hours and 20 minutes to complete. The revised application, which streamlines and simplifies the form, consolidated those 10 forms into a single 13-page document, which includes a cover page and checklist for the applicant's information.[42] The new form is estimated to take under three hours to complete — an estimated burden reduction of nearly 50%.

Aside from simplifying the form itself, USDA launched a new online Loan Assistance Tool that guides farmers through the process of determining their eligibility and submitting their application with easy-to-navigate prompts.

These tools will be coupled with two additional enhancements USDA anticipates to launch in 2023, which includes an online application option that provides the ability for farmers to submit a paperless, online option as opposed to requiring paper-based signatures and submission, and an online direct loan repayment option to save farmers from needing to call, mail, or visit a local Farm Loan Service Center to pay a loan installment.

Together, these changes will reduce *learning costs*, making it easier for farmers to understand the program, eligibility, and documentation requirements; *compliance costs*, making it easier for farmers to complete the necessary paperwork by streamlining required information and bringing processes online; and *psychological costs*, by trying to convey that more eligible farmers can and should access the program.

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42. Department of Agriculture. 2022. "USDA Launches Loan Assistance Tool to Enhance Equity and Customer Service." https://www.fsa.usda.gov/news-room/news-releases/2022/usda-launches-loan-assistance-tool-to-enhance-equity-and-customer-service.

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CASE STUDY

The Form: Continuing Disability Review (Social Security Administration)

Digitizing, simplifying, and streamlining an essential form for demonstrating continued eligibility for disability benefits.

What Is a Continuing Disability Review?

The Social Security Administration (SSA) is required to conduct medical Continuing Disability Reviews (CDRs) for individuals receiving disability benefits. CDRs are periodic reevaluations to determine whether disabled beneficiaries continue to meet SSA's standards for disability. Most disability beneficiaries are expected to complete a CDR every three years. Each year about 540,000 beneficiaries are asked to complete a full CDR, which begins with completing the SSA-454 form. This form requires individuals to provide updated medical, employment, and educational information.

For decades, SSA had estimated that the CDR takes, on average, one hour to complete.[43] But in 2020, when the agency proposed revisions to the frequency that some CDRs were conducted, it received public comments suggesting that this estimate substantially undercounted the time and effort involved in comprehending the instructions and notices, developing the necessary evidence, and completing and submitting the form. In response to this initial feedback, when the agency sought reapproval of the form in fall 2021 it proactively sought public feedback from beneficiaries and other interested members of the process regarding both its burden estimate as well as opportunities for burden reduction.

How Did SSA Improve the CDR Paperwork and Process?

- Public engagement: during this comment period, SSA received compelling responses from beneficiaries that the CDR process can be time-consuming, confusing, and highly stressful. 79 commenters specifically estimated the time they invested in completing the information collection. Over two-dozen comments highlighted the "fear," "anxiety," "stress," or even "dread" of going through a CDR. SSA then held nearly 30 sessions with members of the public where it conducted both discovery research and usability testing on the CDR form.

43. https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=200503-0960-003.

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- Launching iCDR: SSA launched a new service, iCDR, to allow the online submission of CDRs. For many beneficiaries, the iCDR web application provides an option for completing the CDR that is more convenient, quick, efficient, and accessible than the previous process, which relied almost exclusively on mailed-in paper forms.

- Automatic data population: every person who receives a CDR has submitted medical information to SSA, either during their previous CDR or as a part of their initial application. But when beneficiaries receive a paper SSA-454 form, they are expected to re-provide complete information related to their medical providers, prescriptions, and tests. Through iCDR, SSA is able to automatically populate a beneficiary's medical information onto the form, substantially reducing the time spent looking up doctor's names and contact information and details about medical tests and prescriptions.

- Removing potentially burdensome questions: SSA historically used two essay-style questions in the CDR ("Describe what you do in a typical day" and "Do you have any hobbies or interests?"), but through public consultation the agency learned that these questions were both unduly burdensome and potentially generating inaccurate information. After reviewing feedback, including from one stakeholder who described the responses as "used in harmful ways [that] isn't supported by the other evidence," SSA elected to fully remove the questions. Instead, SSA retained a question that allows respondents to more easily identify difficulties completing up to 21 different tasks associated with daily living.

- Consolidation, simplification, and clarification: Across the CDR form, SSA made meaningful changes oriented toward gathering the minimal information needed for the agency to reach out to medical providers to further develop the review. SSA removed several prompts related to documenting "first" and "next" visits to medical providers and removed other requirements because SSA could now receive this information directly from the medical providers. Elsewhere, SSA clarified certain terms and expanded available response options to improve the consistency and ease of responses.

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These changes to the CDR will reduce *learning costs*, making it easier for SSA beneficiaries to understand the materials they need to comply with the CDR process; *compliance costs*, making it easier for beneficiaries to complete the necessary paperwork by streamlining required information, bringing processes online, and carrying over information from past applications; and *psychological costs*, by reducing the use of questions that members of the public had deemed especially stressful or confusing to answer.

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CASE STUDY

The (non-)Form: The Evolution of Total and Permanent Disability Debt Discharge (Department of Education)

Improving the student loan debt discharge process for totally and permanently disabled borrowers to automate eligibility determinations for most disabled borrowers.

Under the Higher Education Act, student loan borrowers who have a total and permanent disability (TPD) that "has lasted" or "can be expected to last" for a continuous period of not less than 60 months are eligible for debt discharge — that is, borrowers no longer need to repay their loans. In August 2021 and October 2022, the Department of Education (ED) issued two final regulations that are a capstone to over a decade of reforms designed to ensure that eligible disabled borrowers can receive debt relief in a minimally burdensome manner. Regulatory changes to the form for applying for debt relief have been essential to expanding access for hundreds of thousands of disabled borrowers.

Early Barriers to TPD and Improvements in Access to TPD over Time

Early statistics associated with TPD policy suggested substantial burdens in learning about, applying for, and navigating the TPD debt discharge process:

- Data from 2007 to 2009 found that the Department received 174,718 TPD applications, but about 45,000 were rejected or remained unresolved.[44]

- As recently as 2016 the government found 387,000 potentially eligible SSA disability beneficiaries who had not applied for TPD, including 179,000 who were currently in default on their loans.[45]

- Since 2013, loans for more than half of the 1 million borrowers who received an initial TPD discharge were reinstated because the borrower did not respond to requests for income documentation, although an analysis conducted by the Department suggests that 92 percent of these borrowers did not exceed the earnings threshold and thus were eligible for the discharge.[46]

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44.   Sasha Chavkin. 2011. "Education Department Bureaucracy Keeps Disabled Borrowers in Debt." Propublica: February 13.

45.   Danielle Douglas-Gabriel. 2016. "Obama to forgive the student debt of permanently disabled people." *Washington Post*: April 12.

46.   87 FR 65904: https://www.federalregister.gov/d/2022-23447/p-830.

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As a result of changes to reduce burdens in the program, by 2023 the Department was able to automatically discharge the debt of more than 450,000 permanently disabled borrowers, because it no longer required applications for many individuals already found disabled by the Social Security Administration or the Department of Veterans Affairs (VA). In addition, the Department expanded the available mechanisms for demonstrating eligibility, and eliminated burdensome income monitoring requirements. As described below, these changes evolved over time as the agency identified burdens in its eligibility standards, documentation requirements, and reporting requirements that were imposing undue costs on certain applicants seeking relief and inhibiting others from accessing the policy entirely.

Moving from Undefined Eligibility Standards to Streamlined Disability Determinations

The original TPD regulations required a doctor's certification of the borrower's disability, but as the Federal Student Aid Ombudsman noted in FY 2008, "the current TPD process lacks published criteria for the conditions that meet the definition of total and permanent disability and specific guidance on medical evidence needed to document the condition. The burden of response and proof falls entirely on the applicant."[47] In the same report, the Ombudsman noted that "[i]n 38 of 106 cases, borrowers failed medical review because their physicians either did not respond to requests for additional medical information or responded with insufficient medical documentation."[48] In many cases, disabled borrowers were not informed about their doctors' non-response.

Beyond the challenges of ensuring their doctor was adequately documenting their disability, many TPD borrowers had already proven their permanent disability to the Federal government through applying for and receiving either VA or SSA disability benefits. However, the original TPD regulations expressly did not accept VA or SSA's disability determinations for the purposes of establishing total and permanent disability.

47.   https://www.documentcloud.org/documents/31739-federal-student-aid-ombudsman-fy-2008-q1-report#document/p31/a9413.

48.   https://www.documentcloud.org/documents/31739-federal-student-aid-ombudsman-fy-2008-q1-report#document/p26/a9405.

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Through a 2012 rulemaking, the Department began accepting an SSA disability determination as proof of a borrower's TPD, allowing these applicants to forgo seeking a separate doctor's certification if SSA had assessed they were unlikely to medically improve in the next five years. This decision built off of previous reforms that allowed for the use of VA disability determinations for disabled Veteran borrowers. However, the majority of SSA disability beneficiaries who were re-evaluated more frequently than once every five years could not use their SSA disability determination as sole proof of TPD eligibility, even if they remained eligible for SSA disability benefits for more than five years in total. In 2022 ED revisited SSA's disability recertification standards. Based on a 2020 SSA report to Congress on continuing disability review outcomes, the Department found that more than 97 percent of adult beneficiaries who were initially assigned a three-year review period were found to still be disabled even after second review, meaning they were, in total, disabled for longer than five years. Accordingly, that report found it was appropriate to grant debt discharge to disabled beneficiaries assigned a three-year disability review frequency.[49] A decade later, in 2022, the Department expanded eligibility to certain SSA disability beneficiaries.

Shifting from Duplicative Applications to Automated Applications

Under the original TPD rules, borrowers with loans from multiple lenders could not submit a single application for debt discharge to the Department of Education, but instead had to submit separate applications directly to each lender. First, in 2012 the Department eliminated this requirement and through rulemaking allowed borrowers to submit a consolidated TPD application directly to the Department. At the time, the Department estimated that half of all TPD applicants had loans with more than one loan holder and that the average applicant with multiple loan holders had five loans.

In 2016, through a joint data-matching agreement between SSA and the Department, the agency began sending notices to TPD-eligible SSA disability beneficiaries encouraging them to apply. This initiative was designed to reduce the learning costs associated with determining potential TPD eligibility, but the Department found that many eligible individuals still did not submit the necessary TPD application. Despite the effort to reduce

49. 87 FR 65904: https://www.federalregister.gov/d/2022-23447/p-863.

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learning costs on eligible disabled borrowers, the burdens associated with comprehending and applying for discharge were high enough that hundreds of thousands of eligible borrowers still did not apply to the program.

By 2021, the Department began using its data-matching agreement with SSA and VA to *automatically* discharge the debt of all eligible individuals found disabled by either of these agencies. Under this policy, these individuals will not face any additional paperwork requirements to demonstrate TPD eligibility. This data-matching achievement was only made possible because of the Department's work starting a decade earlier to treat VA and SSA determinations of disability as sufficient for TPD determinations.

Eliminating Unduly Burdensome Post-Award Reporting Requirements

Under TPD rules in the early 2000s, many borrowers found eligible for debt discharge were subject to a three-year income monitoring period during which their earnings could not exceed the Federal poverty level. The Department found that more than half of the one million borrowers who initially received a TPD discharge ultimately had their debt obligation reinstated because the borrower did not respond to requests for income documentation, although an analysis conducted by the Department with Internal Revenue Service data suggested that 92 percent of these borrowers did not exceed the earnings threshold.[50]

The Department found this was unduly burdensome and used its statutory discretion to fully remove the income monitoring requirement, affirming that "the Department has found that the income monitoring requirement is significantly more likely to result in the reinstatement of a loan for a low-income borrower than it is to identify someone whose income suggests they are able to engage in gainful employment."[51]

50.   87 FR 65904: https://www.federalregister.gov/docu-ments/2022/11/01/2022-23447/institutional-eligibility-under-the-higher-educa-tion-act-of-1965-as-amended-student-assistance#p-830.
51.   87 FR 65904: https://www.federalregister.gov/docu-ments/2022/11/01/2022-23447/institutional-eligibility-under-the-higher-educa-tion-act-of-1965-as-amended-student-assistance#p-830.

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Together, the Department of Education's regulatory changes reduced *learning and compliance costs* by simplifying the requirements for proving eligibility for debt discharge, including in some cases automating the process based on separate eligibility determinations, and reduced *psychological costs* by reducing the hassle and stigma of needing to prove disability status for the purposes of discharge.

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CASE STUDY

The Regulation: Streamlining Housing Program Eligibility Processes Through Rulemaking (Department of Housing and Urban Development)

Modernizing and streamling income reviews and eligibility determinations to reduce burden on tenants, Public Housing Agencies, housing owners, and local governments.

What Is the Housing Opportunity Through Modernization Act (HOTMA) Final Rule?

Every year, the Department of Housing and Urban Development (HUD) supports millions of individuals to live in affordable housing, including low-income families, older adults, Veterans, and individuals with disabilities. To remain eligible for HUD housing assistance, individuals receiving assistance must meet certain requirements, including related to their income and assets. The Housing Opportunity through Modernization Act (HOTMA), enacted in 2016, provided HUD with an opportunity to modernize and streamline the reporting requirements for many beneficiaries of HUD housing assistance.

In February 2023, HUD published a Final Rule implementing key HOTMA provisions, including a number of burden reductions related to methods for calculating family income, defining income, establishing assets eligible families can own, and streamlining the ability of housing owners to check beneficiaries' financial records. This regulation, as well as additional outreach and assistance, will help tenants reduce the number of required interactions with Public Housing Agencies (PHAs) and make it easier to apply for and be admitted into HUD programs.

How Did HUD Build on Public Engagement To Identify Burden Reduction Opportunities?

HUD built on public engagement to develop the HOTMA Final Rule, including public comments HUD solicited on a proposed regulation in 2017, as well as additional comments solicited from the public again in 2020. In response to those comments, HUD implemented additional burden reductions in the Final Rule. For example, HUD expanded the list of means-tested public assistance programs that PHAs and housing owners can use to determine a family's eligibility for housing assistance to include benefits such as the Low-Income

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Housing Tax Credit (LIHTC), Special Supplemental Nutrition Program for Women, Infants and Children (WIC), and Supplemental Security Income (SSI). HUD also aligned requirements across HUD programs to the extent possible given statutory requirements.

What Burden Reduction Does the HOTMA Final Rule Include?

The HOTMA Final Rule includes a number of burden reduction steps across different aspects of the application and ongoing eligibility certification process. These include:

- Using Income Evidence from Other Public Assistance Programs: HOTMA allows PHAs and housing owners to use income determinations made under other Federal benefits programs to establish ongoing eligibility for HUD benefits, and the HOTMA Final Rule leveraged feedback from public commenters to expand the scope of Federal benefits programs to include more public assistance programs. HUD is also exploring data matching agreements with other Federal agencies that would further minimize burden by reducing families' need to separately request documentation from other agencies.

- Reducing Reporting Requirements: HUD exercised regulatory discretion to reduce how often PHAs and housing owners are required to verify tenants' employment and income information during regular reexaminations. This will reduce required interactions between HUD and PHAs and housing owners, as well as between tenant families and PHAs or housing owners.

- Reducing Transactions for Small Changes in Income: Under HOTMA, any increase in family income that is less than 10 percent does not need to be reported until the next annual recertification, sparing families the burden of interim reexamination for small fluctuations in income, and allowing families to keep more of their earnings before receiving a rent increase.

- Eliminating Annual Consent Forms: Families in HUD-assisted housing have traditionally been required to sign a consent form each year, which often requires each adult family member to visit the housing office to complete a form they have already previously reviewed and signed. Through HOTMA, family members only need to sign the required consent form once.

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- Expanding Self-Certification of More Assets: HOTMA revises the definition of annual income and raises the threshold for estimated income from assets from $5,000 to $50,000. This revision incentivizes families to build wealth and reduces burden on families to track down documentation for assets that are not easily computed.

- Streamlining Documentation: For net family assets equal to or less than $50,000, HOTMA reduces the requirement of third-party verification from once a year to once every three years. Two out of three years, PHAs and housing owners can accept self-certification of net family assets equal to or less than $50,000, rather than requiring additional documentation. HUD is also allowing PHAs and housing owners to use the same form that asks about tenants' property and assets to document this self-certification, eliminating the need for an additional form.

What Will American Communities and Families See as a Result of These Changes?

HUD anticipates that these changes will save millions of hours each year for families on housing assistance as well as PHAs and housing owners. As one example, HUD estimates that eliminating the annual consent form will save 10 minutes per form every year across 4.5 million households. That adds up to at least 750,000 hours of annual "time tax" returned to the American people every year. As PHAs and housing owners take advantage of additional flexibilities under HOTMA to reduce how often they ask tenants for information, families should see even more time savings as well as greater predictability regarding when and how their housing assistance might be adjusted.

AGENCY BURDEN REDUCTION INITIATIVES

CASE STUDY

The Commitment: A 20 Million Hour Burden Reduction Target (Department of Homeland Security)

Setting — and Meeting — a Department-wide Burden Target

The Department of Homeland Security (DHS) imposed 203 million hours of paperwork burden on the public in 2021.[52] Whether it is moving through airport security, transporting goods through our ports, or applying for citizenship, DHS interacts with the public in a range of circumstances. All of these interactions and processes often require significant paperwork and time. DHS has committed to improving customer experience by reducing this burden on the public. To mobilize the entire agency behind this goal and begin to move to a customer-centric culture, DHS launched and completed a department wide 20-million-hour burden reduction initiative.[53] Every subagency within DHS committed to finding ways to reduce their paperwork burdens by 10%, whether through simplified forms, new online services, or updated policies. By doing so, DHS subagencies have not only improved the experience of people dealing with the agency, but also reduced administrative burden and time taxes.

As of June 1, 2023, DHS has reduced over 21 million burden hours on the public. For example, the Transportation Security Agency introduced online renewals in the Transportation Worker Identification Credential program, eliminating the need for in-person visits for workers who need access to maritime facilities and vessels. The Federal Emergency Management Agency (FEMA) redesigned the registration process for disaster survivors to apply for aid to eliminate unnecessary questions and reduce complexity, which in turn will dramatically reduce burden on survivors. FEMA also eliminated 2.8 million burden hours by replacing legacy software systems and creating "type-ahead" features in the National Fire Incident Reporting System for local fire departments filing incident reports.[54]

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52.   As measured by the Information Collection Budget for Fiscal Year 2021: https://www.whitehouse.gov/wp-content/uploads/2023/05/2018-2021-ICB.pdf.

53.   Department of Homeland Security Memorandum for Component and Office Heads, *Paperwork Reduction Act Burden Reduction Initiative*: https://www.dhs.gov/sites/default/files/2022-05/Burden_Reduction_Initiative_Memo_Final%20PDF%20CIO%20signed.pdf.

54.   Department of Homeland Security. 2023. "DHS Improves Customer Experience by Simplifying Services Used by the Public." https://www.dhs.gov/news/2023/05/30/dhs-improves-customer-experience-simplifying-services-used-public.

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Anticipating and Addressing Potential Burdens

In addition to these examples, DHS is also anticipating and addressing potential burdens that members of the public might face, as exemplified by rulemaking around mobile drivers licenses. At least eight states have started issuing mobile drivers licenses — also called digital drivers licenses (or "mDLs") — to their residents, and at least three additional states are piloting mDLs. These mDLs reside on people's mobile devices, including smartphones and smartwatches, and provide potential benefits of increased convenience, security, and privacy. mDLs are growing in popularity: one state (Louisiana) reported that over a million residents may already be using its mDLs, and at least 17 other states are exploring mDLs. Beginning in May 2025, a Federal agency cannot accept any state-issued driver's license or identification card, including mDLs, for official purposes unless it complies with the REAL ID Act of 2005.

The fast rise of state-issued mDLs thus presented potential challenges for the Federal government. mDL technology is new and evolving, and both states and the general public have been eager to adopt mDLs. Current DHS regulations, however, do not permit states to issue REAL ID-compliant mDLs. In the absence of updated Federal regulations, individual states may waste time and resources choosing mDL safeguards that fail to meet REAL ID security requirements. Without timely government guidance, this could result in undue burden and confusion for individuals being denied use of mDLs when interacting with Federal agencies — such as at Transportation Security Administration airport security checkpoints. Responding to this potential burden, DHS is developing a proposed regulation that would enable DHS to issue to states a temporary waiver of certain REAL ID regulatory requirements that would allow Federal agencies to accept state-issued mDLs that meet certain security and data integrity requirements.

AGENCY BURDEN REDUCTION INITIATIVES

Other Burden Reduction Efforts

Department of State: Bringing Passport Renewals Online

At least every 10 years, every person with a passport may renew it. The current process requires passport holders to print a two-page form, with an additional four pages of detailed instructions, complete it in black ink, staple a photo that costs about $15 to purchase from a local pharmacy or other business, and mail it back to the State Department with shipping costs averaging between $10 to $30. The State Department estimates that over 7.5 million people go through this process annually, costing U.S. citizens over $150 million in fees — and not including the time spent accomplishing these tasks.

To reduce this burden, the State Department created an online application system to allow qualifying renewal applications to be submitted without the need to mail an application package, photograph, check or money order, and previous passport. The portal will allow members of the public to submit the required information, photograph, and payment all online. This saves the customer time and the cost of mailing physical documents, while also saving the State Department the time and cost of package handling, data-entry, scanning, and the paper fee-collection process. State piloted the new application with the public in August 2022 through February 2023 and over 500,000 people took advantage of this new online option. The Department is now assessing the feedback from the pilot and developing a new version to release in the future. State expects five million customers (or 67 percent of renewals) to qualify to use the online application.

This burden reduction effort exemplifies leading practices of bringing paperwork online, reducing the need for extra steps or activities, and consulting the public, including through user testing and feedback, to design burden reduction efforts.

Department of Agriculture (USDA): Giving More Schools the Option To Reduce Paperwork Burdens Involved in Delivering School Meals

The U.S. Department of Agriculture provides support for schools to offer reduced-cost or no-cost breakfasts and lunches to students.[55] Yet many children who are eligible for reduced-cost or no-cost school meals do not claim those benefits because of complicated paperwork and documentation, as well as the potential stigma that children might encounter in trying to claim their reduced-cost or

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55.   Department of Agriculture. "Community Eligibility Provision." https://www.fns.usda.gov/cn/community-eligibility-provision.

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no-cost meals at school. Another obstacle is unpaid meal debt, which students accumulate when they do not have sufficient money to pay for their food. One survey from the School Nutrition Association suggests that meal debt may total over $19 million in recent years.[56] The Department of Agriculture's Community Eligibility Provision permits schools to offer no-cost school meals to all of their students, if a certain percentage of students participate in other government assistance programs (such as SNAP). In a recent proposed regulation, the Department is proposing to lower the percentage of students who must qualify for those other assistance programs from 40% to 25%, which would give more students, families, and schools the opportunity to participate in no-cost school meals, should states and localities want to participate and provide funds.[57]

USDA anticipates that this action will benefit families and participating schools by eliminating complicated and burdensome school meals paperwork, reducing student meal debt, and lessening the stigma associated with receiving reduced-cost or no-cost meals. In turn, broader access to school meals can improve students' nutrition and academic performance.

This initiative shows how using eligibility for one program to prove eligibility for another program can reduce paperwork and help ensure that families in need receive the support for which they are eligible.

Department of Health and Human Services (HHS): Head Start Categorical Eligibility for SNAP Recipients

In 2022, the U.S. Department of Health and Human Services issued new guidance to Head Start providers to provide families currently enrolled in SNAP with automatic eligibility for Head Start and Early Head Start services. The agency achieved this change through revisiting its agency's interpretation of "public assistance" under Sec. 645 of the Head Start Act, which was previously defined to only include families receiving Supplemental Security Income (SSI) or Temporary Aid for Needy Families (TANF). HHS had found that since 2015, the share of families enrolling in Head Start based on the statute's public assistance receipt prong has declined from 16 percent of total enrollment to just 10 percent

56.　Cited in Kate Grumke. 2023. "Schools ended universal free lunch. Now meal debt is soaring." National Public Radio Public Health: May 3.

57.　88 FR 17406: https://www.federalregister.gov/documents/2023/03/23/2023-05624/child-nutrition-programs-community-eligibility-provision-increasing-options-for-schools.

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in 2019 — a drop of more than 50,000 slots during a time when there have been vacant Head Start slots. HHS assessed that limiting "public assistance" to SSI and TANF receipt caused unnecessary burden for families and grantees during eligibility determinations.

This change will reduce the challenge of navigating multiple eligibility processes and support better alignment and coordination across Federal public benefit programs. By allowing SNAP recipients to be categorically eligible for Head Start services, HHS hopes to reduce the administrative burden for both families and Head Start programs, and to reach more families in need of high-quality early childhood education and comprehensive services.

Department of the Treasury: Simplifying Access to Emergency Rental Assistance During the COVID-19 Pandemic

The COVID-19 pandemic unfolded against one of the most severe housing crises in the United States, and widespread layoffs from the pandemic only exacerbated that crisis. Millions of households were thus at risk of being unable to meet rent payments and faced eviction. Responding to the crisis, Congress passed and Treasury implemented the Emergency Rental Assistance programs as part of the American Rescue Plan Act and other emergency legislation. In designing the implementation of these programs, Treasury took a number of important steps to reduce administrative burdens and ensure equitable delivery of benefits.[58]

All of these steps reflected leading practices in burden reduction described above. For example, Treasury published multiple resources to encourage grantees to use well-validated strategies, including:

1. Using self-attestation of eligibility and fact-specific proxies for eligibility — for instance, using the fact that an applicant lived in a high-poverty area or received state or Federal assistance as evidence of income eligibility without the need for burdensome documentation;

2. Ensuring that applications were available in multiple forms (including phone, in person, and online);

58.   Department of the Treasury. "Emergency Rental Assistance Program: Guidance." https://home.treasury.gov/policy-issues/coronavirus/assis-tance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/guidance.

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3. Comparing applications to local data to drive and course correct outreach strategies throughout the life of the program;

4. Partnering with trusted community-based organizations to increase awareness of rental assistance benefits and help support applicants' needs; and

5. Ensuring applications were available in Spanish and other locally relevant languages.[59]

Treasury carried out these strategies by posting model state and local applications incorporating these practices on their website, and a number of grantees have adopted these practices.[60] In addition, Treasury is evaluating these burden reductions to examine their effects on the receipt of rental assistance.[61]

Department of Education (ED): Streamlining Student Access to Federal Aid

Around 18 million students and families file the Free Application for Federal Student Aid (FAFSA) each year. The FAFSA is the main channel for students to apply for Federal and state financial aid. Currently, the Department of Education estimates that filing the FAFSA takes a little over one and a half hours for a first-time dependent student, and a little over three-quarters of an hour for a first-time independent student. Already, the Department of Education has taken important steps to streamline and simplify the process of FAFSA paperwork, recognizing that the form can be an important barrier to students obtaining the assistance they need to pursue higher education.

Through the FAFSA Simplification Act as well as the FUTURE Act, the Department of Education is taking additional steps to reduce the burden of completing FAFSA paperwork for students and their families.[62] For example, the Department will,

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59. Department of the Treasury. "Emergency Rental Assistance Program: Promising Practices." https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/promising-practices.

60. Department of the Treasury. "Emergency Rental Assistance Program: Forms." https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/promising-practices/forms.

61. Office of Evaluation Sciences. "Learning what works to support equitable delivery of the American Rescue Plan." https://oes.gsa.gov/american-rescue-plan/.

62. Department of Education. "FAFSA Simplification Fact Sheet Overview." https://financialaidtoolkit.ed.gov/resources/fafsa-simplification-fact-sheet.pdf.

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wherever allowable and feasible, now receive tax information directly from the Internal Revenue Service to calculate a student's eligibility for Pell Grants as well as the Student Aid Index — the Federal government's estimate of students' ability to pay for college. In addition, the Department will remove questions about Selective Service registration and drug convictions from the FAFSA, and simplify existing questions for students who are homeless, orphans, former foster youth, or who have other unusual circumstances that pose obstacles to documenting parental information. Last, the Department will expand the translation support for FAFSA resources to cover the eleven most-common languages spoken in the United States.

These shifts reflect leading practices in burden reduction, including using data linkages and matching to reduce the information required from applicants, removing unnecessary and burdensome questions, simplifying questions, and broadening language access for non-English-language speaking populations.

Small Business Administration (SBA) and U.S. Patent and Trademark Office (USPTO): Setting Up Small Businesses for Success

Starting and operating a small business is not a small feat; the five-year survival rate for a new business is under 50% according to the Small Business Administration.[63] There are many programs that support small businesses, but administrative burdens can make them more difficult to use. To address this concern, the USPTO and the SBA are working to ensure these nascent businesses can more easily access needed support.

For smaller inventors who are first-time patent filers, examination wait times and fees for the patent application can often act as a barrier to commercialization and bringing their products to market. The USPTO has committed to aid in lowering both barriers. First, the Office launched the "First-Time Filer Expedited Examination Pilot Program" so that a patent application filed by a qualified applicant receives expedited initial review of their application. Second, the USPTO recently amended its regulations to provide greater discounts on certain patent fees for small and micro entities. In total, 194 separate fees for small and micro entities were reduced; such reductions are expected to save inventors some $100 million annually.

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63.   Small Business Administration. 2023. "Frequently Asked Questions." March: https://advocacy.sba.gov/wp-content/uploads/2023/03/Frequently-Asked-Questions-About-Small-Business-March-2023-508c.pdf.

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SBA also provides significant support to entrepreneurs as they start, run, and grow their small businesses. To ensure they can easily access SBA's programs, the agency launched the "MySBA" initiative. MySBA will improve customer experience across SBA programs and harmonize SBA processes to reduce duplication. MySBA will create an online platform, with a single-sign-on tool and dashboard, where business owners can access SBA programs and view interactions across those programs. The initiative will modernize SBA's existing technology to support data sharing across SBA programs, reduce the duplicative information that business owners must submit to SBA, and decrease the time SBA spends on processing requests. The initiative will transform how business owners interact with SBA and improve access to their vital programs.

One of the first projects launched through the MySBA initiative is called "VetCert." The Federal government recognizes the importance of supporting the entrepreneurial spirit of Veterans and many opportunities to work for and with the Federal government are reserved for Veteran-owned businesses. Through the new VetCert platform on MySBA there is now a one-stop-shop to become certified as a Veteran-or service-disabled-Veteran-owned small business, opening access to these opportunities to more eligible former service members. While developing the program, SBA engaged the Veteran community and used this feedback to create processes that were less burdensome on program participants. As a result, VetCert offers a streamlined certification process that is easier to understand and only requests documentation that is necessary to review the certification application. Over 25,000 Veteran- or service-disabled-Veteran-owned small businesses will immediately benefit from this new system.

AGENCY BURDEN REDUCTION INITIATIVES

Agency-Wide Burden Commitments

Department of the Treasury Internal Revenue Service (IRS): Modernizing the Taxpayer Experience

Paying taxes is one of the most broadly-shared interactions that individuals, families, and small businesses have with the Federal government. The amount of time that members of the public spend completing their taxes makes up over 70% of the overall paperwork burden managed by OIRA each year, and on average individual taxpayers will spend around eight hours and $140 preparing their taxes.[64] With new resources from the Inflation Reduction Act, the Internal Revenue Service was able to hire new customer service representatives to answer 6.5 million calls in the 2023 filing season, 2.4 million more calls compared to the same period in 2022, and cut phone wait times to four minutes compared to nearly 30 minutes in the previous year.[65] In addition, the IRS has further reduced taxpayer burden by permitting taxpayers to respond to notices online for nine of the most common notices, among other important steps.

As part of a broader transformation plan over the next eight years, also supported by the Inflation Reduction Act, the IRS has proposed a number of additional steps to improve IRS technology and deliver a modernized taxpayer experience that incorporates a number of burden reduction practices.[66] These new services include introducing new options for taxpayers to engage with the IRS online (including through digital forms and self-service activities); exploring a new free, voluntary IRS-run electronic filing system (also called Direct File); providing greater legal certainty upfront through guidance; making payments easier to deliver to the IRS; proactively assessing and addressing barriers that taxpayers encounter when filing online; and creating new status-tracking tools for taxpayers to see real-time options, next steps, and estimated time to processing submitted documents.

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64. Internal Revenue Service. 2023. "Report to Congress." May: https://www.irs.gov/pub/irs-pdf/p5788.pdf.

65. Internal Revenue Service. 2023. "Filing Season 2023 Report Card: IRS Delivered Significantly Improved Customer Service." April: https://home.treasury.gov/news/press-releases/jy1421.

66. Internal Revenue Service. 2023. "Internal Revenue Service Inflation Reduction Act Strategy Operating Plan." April: https://www.irs.gov/pub/irs-pdf/p3744.pdf.

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Veterans Affairs (VA): Creating a Fully Digital Experience for Veterans

The Department of Veterans Affairs is building a customer-centered culture to focus on the experience of their customers, Veterans, their families, survivors and caregivers. As part of this commitment, the VA is identifying every PDF or paper form that currently cannot be submitted digitally in order to convert them to more user-friendly digital services. Creating digital submission platforms for these forms will allow the VA to reduce the number of questions asked and the steps to be followed, as well as to add in features, such as inputting known data, to reduce burden on the filer. Each year, Veterans and their families spend 64 million hours completing PDF forms, and the VA has identified 263 forms that Veterans or their families use that are currently only available in PDF or paper copies.

One example of VA's digitization is a new electronic system that allows eligible Veteran and dependent students to create an account and submit their claim/application to VA for educational benefits to be processed electronically. Applicants can also use the system to check the status of their claims. The system provides students an easy, real-time way to record their attendance and ensure their benefits continue.

The VA has also taken steps to provide Veterans the opportunity to submit online a supplemental claim for disability compensation benefits. Over 32,000 supplemental claims are submitted monthly, which presents a clear opportunity to streamline and enhance online access. To further improve the online application process for Veterans filing a claim for health care benefits, VA implemented a shorter online process for certain Veterans with service-connected disabilities, permitting them to bypass the military service and finance/household sections of the application.

Finally, the VA has permitted Veterans access to their disability benefits decision award letters online and through a mobile application. Prior to this feature, Veterans had to wait for their decision award letter to arrive through physical mail to have tangible evidence of VA's decision. This digital solution provides Veterans the ability to view and download their decision letters online, allowing them to take follow-up actions faster and reducing the need for them to contact VA call centers regarding the status of their mailed letter. Voice over capabilities for visually impaired Veterans built into this platform mean that the feature is more accessible to more Veterans.

AGENCY BURDEN REDUCTION INITIATIVES

United States Agency for International Development (USAID): Eliminating Internal Burdens To Empower their Workforce

This report focuses primarily on administrative burdens facing the public, but in many cases agency staff also face burdens from unnecessary paperwork, processes, or documentation requirements. These *internal* administrative burdens can hamper an agency's ability to carry out its mission. USAID understands that tackling administrative burden inside an agency can have significant impacts on how they can serve the public by redirecting staff time from paperwork to more impactful activities. USAID recently published a new Policy Framework that takes aim at reducing USAID's internal and external burdens through its Burden Reduction Program. USAID has committed to eliminating processes that are "low-value, overly time-consuming, outdated or unproductive." Through this work, USAID hopes to continuously improve burdensome, bureaucratic processes, significantly expanding the time and resources their employees have to work alongside partner countries and deliver high-impact humanitarian and development work. The initial set of reforms USAID is pursuing as part of its Burden Reduction Program are based on thousands of suggestions collected from across the Agency. Key reforms include reviewing USAID's over two hundred forms and decommissioning inactive ones and simplifying remaining ones; streamlining procedures for rapid, simplified grants; and standardizing and simplifying travel procedures across the Agency. USAID has committed to continuing this work throughout the next year and identifying further opportunities to reduce both internal and external burdens.[67]

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67.   US Agency for International Development. 2023. "Policy Framework: Driving Progress Beyond Programs." March: https://www.usaid.gov/sites/default/files/2023-05/Policy%20Framework%20%28V16%29%2005-04-2023_2.pdf.

Section 4: Conclusion

This report captures only a subset of the burden reduction efforts underway across the Federal government, and many more initiatives are still in early stages. As OIRA looks to the coming years, two priorities we have identified are (1) supporting agencies in embedding burden reduction across different agency activities, as exemplified by the work already underway at the Department of Homeland Security, the Treasury Department, the Department of Veterans Affairs, and the U.S. Agency for International Development, and (2) deepening agencies' engagement of the public to help highlight burdens to be addressed. OIRA looks forward to working closely with our Federal agency partners and members of the public to tackle burdens and time taxes in the coming weeks and months.