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

JUL 25 2000

ADMINISTRATOR
OFFICE OF
INFORMATION AND
REGULATORY AFFAIRS

MEMORANDUM FOR CHIEF INFORMATION OFFICERS

FROM: John T. Spotila

SUBJECT: Achieving Electronic Government: Instruction for Plans to Implement the Government Paperwork Elimination Act

This memorandum outlines the plan each agency must submit under OMB Memorandum M-00-10, "OMB Procedures and Guidance on Implementing the Government Paperwork Elimination Act." These plans will be an important component in our collective efforts to promote electronic government that improves efficiency and customer service through the use of information technology. The Federal government's overall transition to electronic government relies heavily on agency use of the Internet and other electronic methods to receive and deliver information and services. Careful agency planning is critical to ensure that this transition succeeds. As part of this planning, agencies should reevaluate how they do business by updating business processes to take advantage of the automation. Agencies should also consider automating groups of processes that serve a common customer together, and coordinating with other agencies, to achieve customer-centric approaches to electronic government.

Background. OMB M-00-10 requires that each agency must submit to OMB, by October 31, 2000, its plan for implementing the Government Paperwork Elimination Act (the Act) 105-277. You can access a copy of the memorandum on OMB's web page at http://www.whitehouse.gov/OMB/memoranda/m00-10.html. As the Director explained in the memorandum, "each agency must build on their existing efforts to implement electronic government"; "prioritize agency implementation … based on achievability and net benefit"; and "coordinate the plan and schedule with their strategic IT planning activities that support program responsibilities consistent with the budget process." Section 3 of the Director's guidance describes other factors that agencies need to consider. Guidance on other implementation issues covered by the Act will follow shortly from the Departments of Treasury, Justice, and Commerce, and the National Archives and Records Administration.

What transactions must your agency address in its plan? Under the Act, agencies must offer the option, when practicable, for the maintenance, submission, or disclosure of information by electronic means by October 2003. To implement the Act, and electronic government more broadly, your plan must address how your agency will rely on information technology to carry out the following types of transactions:

- <u>Information collections under the Paperwork Reduction Act (PRA) (Attachment A).</u> This is important because providing for optional electronic reporting, recordkeeping, and disclosure, and related processing of that information can decrease the public's paperwork burden and can increase the practical utility of the information.

- <u>Non-PRA covered transactions (Attachment B).</u> This includes:

    - <u>Interagency reporting requirements.</u> This is important because electronic reporting between Federal agencies can reduce costs and increase information's practical utility.
    - <u>Information products that agencies disseminate to the public.</u> This is important because agencies can distribute information more widely, more efficiently, and at a lower cost by making it available electronically.
    - <u>Other transactions.</u> If your agency identifies any other transactions important in implementing electronic government it may report them here.

Attachment A and Attachment B outline the content and format of the plan. Attachment C requests supplemental information for any transactions that your agency has determined pose a "high risk" (based on a risk analysis). For guidance on high risk transactions, see Part II, Sections 3 and 5, of OMB Memorandum M-00-10. Because your plan will explain how your agency will expand its use of electronic methods to carry out its business, it does not need to address those transactions that already provide a fully electronic option.

<u>What must your agency's submission include?</u> You must submit the following information to OMB by October 31, 2000:

- a brief (e.g., one to two pages) cover letter on your agency's overall strategy and efforts to comply with the Act;
- your agency's plan for PRA collections (Attachment A);
- your agency's plan for interagency reporting, information dissemination activities, and other agency identified transactions (Attachment B); and
- your agency's plan for any high risk transactions identified (Attachment C).

<u>How should your agency's plan relate to strategic IT planning in the budget process?</u> You should ensure that the plan is consistent with OMB fiscal and policy guidance. If your agency will need additional resources to implement the plan, your agency's budget request under OMB Circular A-11 (e.g., through Exhibit 300B) should reflect that need and tie to the plan. Agency Government Performance and Results Act (GPRA) reports should address, as appropriate, progress in implementing the Act and electronic government.

<u>Do agencies need to include issues related to the Electronic Signatures in Global and National Commerce Act (ESIGN)?</u> ESIGN covers most business, consumer, and commercial transactions and overlaps with some transactions covered by the Act, primarily with regard to regulated transactions. ESIGN requires some additional analysis and a more rapid implementation schedule but has the same fundamental goal as the Act in promoting electronic government. OMB will promulgate guidance on ESIGN in consultation with the agencies.

In what format should the CIO provide this information to OMB? You should submit this information via e-mail. If this is not possible, provide the information on a 3.5" diskette, labeled with the agency name and the filenames of the submission. You should submit the cover letter and the information requested in Attachment C as word processor or simple text files. You should submit the tables called for in Attachments A and B as separate tabular files in one of the following formats (in order of preference):

1. Microsoft Excel 97 or earlier;
2. Lotus 1-2-3 Release 9 or earlier;
3. Microsoft Word 97 or earlier; or
4. WordPerfect, version 8.0 or earlier.

When and to whom should your agency respond and where should it send the responses? You must transmit plans to OIRA no later than Tuesday, October 31, 2000. Please transmit the plans to:

Jonathan Womer: jwomer@omb.eop.gov
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW - Room 10236
Washington, DC 20503

Whom should you contact for further information? Should you have any questions regarding this memorandum, contact Jonathan Womer in OIRA at (202) 395-3785.

Attachments

Attachment A – Collections of Information under the Paperwork Reduction Act (PRA).

<u>What is the purpose of this Attachment?</u> This Attachment explains what information your agency must submit regarding plans for providing a fully electronic option for transactions that are part of the information collection process, consistent with OMB Memorandum M-00-10 on implementing the Act. Under the Paperwork Reduction Act (PRA, 44 U.S.C. 3501-20), the collection of information is:

> "the obtaining, causing to be obtained, soliciting, or requiring the disclosure to an agency, third parties or the public of information by or for an agency by means of identical questions posed to, or identical reporting, recordkeeping, or disclosure requirements imposed on, ten or more persons, whether such collection of information is mandatory, voluntary, or required to obtain or retain a benefit." (5 C.F.R. 1320.4)

In providing an electronic option by October 2003, you will need to assess the practicability of optional electronic reporting and further electronic correspondence with the respondents for its collections of information that require OMB approval. If you determine that optional electronic reporting and/or electronic communication with the respondents is not practicable, you must explain why to OMB in the table below.

Your plan should focus on its <u>recurring</u> information collections. You do not need to address <u>one-time, non-recurring</u> collections (e.g., a one-time research survey) in the plans your agency submits to OMB.

<u>Does OMB have information on PRA collections that already have been automated?</u> Your agency does not need to report existing fully electronic transactions in the table. A fully electronic option for a PRA collection is one that has no <u>compulsory paper-based</u> reporting requirements, signatures, correspondence, or dissemination to or with the respondents. To help you identify any such collections, OIRA will provide you a list of your agency's collections that our PRA system indicates currently allow for at least <u>some</u> electronic reporting. Each agency should review this list to determine which of the collections provide a <u>fully</u> electronic option (you can access OMB's listing of all currently approved collections at http://www.whitehouse.gov/library/omb/OMBINV.html). In addition, a recent memorandum from the President's Management Council is gathering information on "Meeting the Requirements of the December 17, 1999 Presidential Memorandum on Electronic Government." The information reported under this memorandum on placing on-line the forms for the top 500 government services will be made available to the agencies to build upon in developing the required plan and schedule.

<u>What does your agency need to report in Attachment A?</u> Submit the following information as a separate electronic file and in tabular format.

1. **Agency**: The name of the Federal department or agency responsible for the collection.

2. **Bureau**: The name of the bureau or office responsible for the collection. If none exists, or if the transaction spans more than one bureau, leave this field blank.
3. **Name:** The name of the collection (or group of related collections). As appropriate you may report related collections together as one record in the table below. For example, if three forms are required to apply for and receive a grant from your agency, you may report all three collections together. This is especially useful to demonstrate how automation can help to provide customer-centric approaches to electronic government that integrate discrete collections. As another example, if a specific reporting requirement in a regulation requires four different submissions of related information you may report those collections together.

   Further, you may list separate groups of related collections as one record in the table if they are functionally similar and will be automated together on-line in the same time frame. For example, if your agency has multiple grants with multiple applications and all the applications will be put on-line at the same time, then the "application for agency grants in program area X" may be aggregated as one collection category.
4. **Description**: A short description of the nature of the collection(s). Please be brief.
5. **Description of respondents**: The respondents to the collection(s). Use broad categories (e.g., banks, individuals, State governments, etc.).
6. **Number of Respondents**: A numerical estimate of the total number of separate persons or entities that will respond to the information collections listed in #7 below.
7. **OMB control numbers**: Provide the collections' OMB PRA control number(s), separated by a comma and a space if there is more than one (i.e., 0354-0123, 0354-0143, 0354-0432, etc.). Some groups of collections may have more than one control number, and these may be reported as one entry with multiple OMB control numbers. Conversely, a control number may cover a number of separate collections; thus, a single OMB control number may be repeated.
8. **Completion Date**: Indicate when your agency will offer a fully electronic reporting option for the collection(s) in question (format: mm/yyyy). If there are no current plans for a fully electronic option, indicate "Unknown".
9. **Post 10/2003**: If the date in the previous field is "Unknown" or later than 10/2003, describe in 1-2 sentences why the transaction will not be automated by 10/2003. Identify any statutory, practicability, or other barriers. If the date in the previous field is 10/2003 or earlier leave this field blank.
10. **Electronic Signature**: Indicate whether the agency plans to use electronic signatures with this collection(s) ("YES"/"NO"). For guidance on electronic signatures, see Part II, Section 2 and 7, of OMB Memorandum M-00-10.

What is an example of the table that your agency must prepare under Attachment A?

Agency	Bureau	Name	Description	Description of Respondents	Number of Respondents	OMB Control Numbers	Completion Date	Post 10/2003	Electronic Signature
Agency of Federal Government	Bureau of Grant Making	Medical research grants	The agency accepts and reviews applications for medical research.	Universities, Research Institutes, Hospitals	3,000	####-####, ####-####	06/2002		YES
Agency of Federal Government	Bureau of Benefit Program	Application for benefit program	Citizens apply for the benefit program and the agency judges if they meet the qualifications and delivers the benefits.	Citizens	65,000	####-####	Unknown	Because of their situation it is unlikely that applicants will be able to use an electronic option by October 2003.	NO
Agency of Federal Government	Bureau of Oversight	Pollution filings of regulated entities	Required firms report on pollution measurements and their work to comply with regulations	Firms in the regulated industry.	10,000	####-####, ####-####, ####-####	07/2002		YES

Attachment B – Interagency Reporting Requirements

What is the purpose of this Attachment? This Attachment explains what information your agency must submit regarding its plans for offering an electronic option for interagency reporting, information dissemination activities, and other agency-identified transactions, consistent with OMB Memorandum M-00-10 on implementing the Act.

- Interagency reporting encompasses ongoing, periodic reports among agencies. Examples of interagency reporting are the exchange of personnel and pay-roll reports between agencies or the annual reporting of information to another agency.
- Information dissemination activities refer to the dissemination of "information dissemination products," publications that are intended for the general public. OMB guidance on "information dissemination products" can be found in Circular A-130, Sections 6.c, 6.h, 8.a(5), 8.a(6), and 8.a(8). An example of an "information dissemination product" is the ongoing and periodic release of labor statistics.
- Agency-identified transactions are any other transactions that your agency believes are important to address and that are not captured elsewhere in the plan.

Fully electronic transactions do not need to be reported in this table. If your agency already fully reports (or receives if an interagency reporting requirement is from your agency) in an electronic form, you do not need to identify that transaction in your plans.

What does your agency need to report in this section? Submit the following information as a separate electronic file and in tabular format.

1. **Agency**: The name of the Federal department or agency responsible for the reporting or dissemination products.
2. **Bureau**: The name of the bureau or office responsible for the report or dissemination. If none exists, or if the report or dissemination product spans more than one bureau, leave this field blank.
3. **Name:** The name of the interagency report or information dissemination product (or group of similar reports or products). You may report on categories of similar reports or dissemination products instead of specific reports or dissemination products if the reports or products are functionally similar and would be automated together on-line in the same time frame.
4. **Description**: A short description of the interagency report or information dissemination product (or groups of reports or products). Please be brief.
5. **Description of Partners:** Federal agencies or Dissemination product users. For an interagency report, indicate which Federal agencies submit reports to the agency listed in #1 above, or if interagency forms are used (e.g. personnel information) for administrative tasks simply put "Federal Agencies." For information dissemination, describe who receives the information dissemination product. Use broad categories (e.g., banks, individuals, State governments, etc.).
6. **Number of Respondents**: A rough numerical estimate of the number of separate agencies, persons, or entities described in #5 above.

7. **Completion Date**: Indicate when the reports or products will offer a fully electronic reporting or dissemination option (format: mm/yyyy). If there are no current plans for a fully electronic option, indicate "Unknown".
8. **Past 10/2003**: If the date in the previous field is "Unknown" or later than 10/2003 describe in 1-2 sentences why the transaction will not be automated by 10/2003. Identify any statutory, practicability, or other barriers. If the date in the previous field is 10/2003 or earlier leave this field blank.
9. **Electronic Signature**: Indicate whether the agency plans to use electronic signatures with this transaction(s) ("YES"/"NO"). For guidance on electronic signatures, see Part II, Sections 2 and 7, of OMB Memorandum M-00-10.

What is an example of the table your agency must prepare under Attachment B?

Agency	Bureau	Name	Description	Description of Partners	Number of Respondents	Completion Date	Post 10/2003	Electronic Signature
Agency of Federal Government	Bureau of Personnel	Interagency reporting on personnel transfer	The agency sends personnel information to another agency when an employee transfers to that agency.	Federal Agencies	73	04/2002		YES
Agency of Federal Government	Bureau of Analysis	Report on Projected Manufacturing Growth in Economy from 2002-2007	Providing the report to business and academic community.	Manufacturing Businesses, Academics	500	06/2001		NO

Attachment C - High Risk Transactions

What is the purpose of this Attachment? This Attachment explains the additional information you must provide for those transactions listed in Attachments A or B that you have identified as high risk, consistent with OMB Memorandum M-00-10 on implementing the Act. Section 3(a)(2) of OMB M-00-10 states:

> "Agency considerations of cost, risk, and benefit, as well as any measures taken to minimize risks, should be commensurate with the level of sensitivity of the transaction. Low-risk information processes may need only minimal consideration, while high-risk processes may need extensive analysis."

This Attachment covers those high risk collections that require additional risk management measures. We expect that in most cases, your agency will only need to address a small number of particularly sensitive information collections or those involving very large numbers of respondents.

What should the additional report contain? For each high risk transaction listed in Attachments A or B that requires additional risk management measures, please submit a separate page to answer the following:

1. What is the name of the related information collection(s)? Use the exact "Name" used in the table submission outline in Attachment A or B.
2. Describe the transaction. What information is being exchanged? What is the value of this transaction to the government and the transaction partners?
3. If it is not practicable to automate the transaction as part of the plan, why? What is your strategy to make such conversion practicable?
4. How sensitive is the transaction? How is your agency managing the risk (e.g., management or legal controls, information security practices, authentication techniques, or other business processes)? Please describe the measures being taken.
5. Is your agency considering/using more than one electronic signature option? If the transaction involves more than 50,000 responses per year and your agency will not offer multiple electronic signature options, why not?

What should be the format of the response to Attachment C? Please indicate clearly which response relates to which question. You may determine the length and specific format of this information.