July 2024

Tackling the Time Tax

2024 Edition

Making Important Government Benefits and Programs Easier to Access

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Executive Summary

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Every day, individuals, families, and small businesses are subject to unnecessary burdens when interacting with government programs, including through needlessly complicated forms, requests for redundant detailed information, or confusing application processes.

Reducing burdens to access public benefits and services is a central priority for the Biden Administration.[1] Consistent with its responsibilities under the Paperwork Reduction Act (PRA), the Office of Information and Regulatory Affairs (OIRA) announced a new initiative in 2022 to (1) more accurately estimate the burdens faced by the public when accessing government benefits and programs; and (2) work with Federal agencies to reduce those burdens, both when reviewing information collections and when reviewing regulations.[2]

Last year, OIRA released its first annual report summarizing agency efforts to reduce administrative burdens.[3] This year, OIRA is releasing its second such report, which summarizes burden reduction initiatives across a range of Federal agencies, including:

- Joint efforts by the Centers for Medicare & Medicaid Services and the U.S. Digital Service to make it easier for eligible beneficiaries to enroll in Medicaid and renew their enrollment.
- The Small Business Administration's work to reduce unnecessary hassles on small businesses looking to obtain and maintain government loans.

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

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, Tackling the Time Tax: How the Federal Government is Reducing Burdens to Accessing Critical Benefits and Services, July 2023: https://www.whitehouse.gov/wp-content/uploads/2023/07/OIRA-2023-Burden-Reduction-Report.pdf.

- The Internal Revenue Service's progress on simplifying taxpayer notices.
- The Social Security Administration's efforts to simplify the process for confirming eligibility for disability benefits.
- The Department of Homeland Security's work to streamline the employment eligibility verification service.
- Parallel efforts by the U.S. Agency for International Development and Department of Health and Human Services to simplify notices of grant opportunities.
- The Department of Justice's efforts to make it easier to seek a pardon.
- The Department of Agriculture's commitment to partnering with states to streamline the process of proving eligibility for food assistance.

These initiatives will help millions of individuals, families, and small businesses. For example, they will allow more than 5 million Americans to automatically renew their health coverage without filling out paperwork, saving them 2.5 million hours of their lives; disburse money three times faster to small businesses suffering from a natural disaster; reduce burdens on 350,000 employers a year seeking to verify potential employees' eligibility to work; and eliminate nearly 200,000 hours of burden in the Social Security Administration's Supplemental Security Income (SSI) program that helps low-income older and disabled Americans.

OIRA looks forward to continuing to work closely with Federal agencies on implementing high-impact burden reduction measures.

Section 1

“Administrative Burdens,” Why They Matter, and How OIRA Is Reducing Them

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The Cost of Administrative Burdens

One important reason 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.[4] For some families or small businesses, administrative burdens keep them from accessing much-needed benefits altogether. Others may succeed in accessing benefits, but pay a heavy toll through lost time, greater stress, the shame of stigma, or other costs.

These administrative burdens are no small thing. For example, 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 mean that more families struggle to get ahead, more small businesses struggle to grow, and more individuals are stuck in cycles of poverty. Overall, it means our country does not live up to its economic potential.

Administrative burdens also do not fall equally across the whole population. People who are already struggling or are marginalized tend to also be subject to larger administrative burdens. Families with irregular wages due to unemployment are likely to have a harder time documenting their income than families with steady employment. Small businesses, often family run, may not have staff to focus on completing the paperwork necessary for government loans or contracts. Workers with multiple, part-time jobs are likely to 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.

4. For further discussion on the “Time Tax” refer to E.O. 14058.

5. Department of Agriculture, Food and Nutrition Service, National and State Level Estimates of WIC Eligibility and Program Reach in 2020, last updated November 3, 2023: https://www.fns.usda.gov/wic/eligibility-and-program-reach-estimates-2020.

6. See for instance: Alex Muresianu & Garrett Watson, Reviewing the Federal Tax Treatment of Research & Development Expenses, Tax Foundation, April 13, 2021: https://taxfoundation.org/research-and-development-tax.

Administrative burdens do not just keep eligible individuals from accessing programs: they also sap Americans’ trust in the ability of government to meet their basic needs or operate efficiently or fairly. In addition, the stigmatizing interactions that some individuals have with the government — even if just unnecessary trips back-and-forth to government offices or intrusive questions on forms — make it less likely that those individuals will engage in other aspects of civic life.[7]

Measuring Administrative Burden

OIRA has been working to better account for the consequences of public benefit programs failing to reach all who are eligible for them. The National Science and Technology Council Subcommittee on the Frontiers of Benefit-Cost Analysis, which OIRA co-chairs, convenes experts from across agencies to identify common challenges to monetizing and quantifying important regulatory effects, share knowledge about best practices, and engage with researchers both inside and outside the government to make use of the best available science and economics. In its 2023 report, the Frontiers subcommittee identified as a focal category the effects of public programs that deliver an array of direct benefits and services to individuals and families.[8] These include nutritional support, housing subsidies, health insurance, student aid programs, and many others. The Frontiers report identified ways in which the research community could address gaps that make it hard for agencies to monetize the full effects of these programs in regulatory analyses. Already, research has found that many of these programs — particularly investments in low-income children’s health, housing, and education — have large long-term net benefits.[9]

The 2023 Frontiers report also highlighted how agencies struggle to account for the ways in which time costs, stresses, and other barriers to accessing these programs can contribute to reduced participation. The report notes that

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

8. National Science and Technology Council, Subcommittee on Frontiers of Benefit-Cost Analysis, Advancing the Frontiers of Benefit-Cost Analysis: Federal Priorities and Directions for Future Research, December 2023: https://www.whitehouse.gov/wp-content/uploads/2023/12/FINAL-SFBCA-Annual-Report-2023.pdf.

9. See, e.g., Nathaniel Hendren & Ben Sprung-Keyser, A Unified Welfare Analysis of Government Policies, 135 Quarterly Journal of Economics (2020): 1209-1318.

quantifying the relationship between a marginal burden increase and reduced program uptake (or vice versa) can be challenging. The 2023 Frontiers report identifies a number of opportunities for the research community to contribute to addressing these challenges. Better estimation of the long-run effects of public programs and administrative burdens’ effect on take-up of those programs can inform and improve future policymaking.

Academics and researchers both within and outside of government continue to help inform how the Federal government works to most effectively minimize burdens. Last fall, the Russell Sage Foundation’s Journal of the Social Sciences published a two-part issue on Administrative Burdens and Inequality in Policy Implementation, advancing our understanding of the experience of administrative burdens in Medicaid and health inequality, student loan repayment programs, immigration to the U.S, child and family support programs, the child welfare system, disaster and housing relief programs, and housing support programs.[10] Within government, the General Services Administration’s Office of Evaluation Sciences (OES) has published research conducted with partner agencies studying the effects of strategies to improve outreach to eligible populations, lower barriers to applying for assistance, and streamline processes associated with applying for and maintaining eligibility for American Rescue Plan-funded programs.[11] Among other insights, these evaluations showed that intensive outreach strategies, including active support (for example, phone calls to prospective applicants which provided help navigating application processes), had a greater effect on improving program take-up than information interventions alone.[12]

Making Programs Work Better

While efforts to reduce administrative burdens are sometimes cast as in tension with the goal of maintaining program integrity — that is, ensuring that

10. Russell Sage Foundation, New RSF Journal Issue: Administrative Burdens and Inequality in Policy Implementation, October 18, 2023: https://www.russellsage.org/news/new-rsf-journal-issue-administrative-burdens-and-inequality-policy-implementation.

11. General Services Administration, Office of Evaluation Sciences, American Rescue Plan: https://oes.gsa.gov/american-rescue-plan/.

12. General Services Administration, Office of Evaluation Sciences, Identifying Interventions to Increase Affordable Care Act Uptake Through a Systematic Review and Meta-analysis: https://oes.gsa.gov/results/aca-systematic-review-meta-analysis/; General Services Administration, Office of Evaluation Sciences, Increasing Access to Minnesota Child Care Stabilization Base Grants: https://oes.gsa.gov/projects/2209B-increasing-access-to-childcare-grants/.

the government delivers benefits and services only to eligible individuals, families, and small businesses — in practice this is rarely the case. Reducing administrative burdens, ensuring program integrity, and preventing wasteful spending often go hand-in-hand. In many cases, agencies can reduce administrative burdens without affecting program integrity at all. For example, when the General Services Administration analyzed the effect of simplified documentation requirements for Emergency Rental Assistance applications, it found no impact on detection of fraudulent applications.[13] In other cases, agencies can reduce administrative burdens while improving program integrity. For example, the E-Verify+ service — discussed later in this report — empowers employees to electronically input their own information for Form I-9, rather than requiring it to be completed by their employer, which will reduce data entry errors. Similarly, the automatic ("ex parte") Medicaid renewal process — also discussed later in this report — eliminates unnecessary paperwork by relying on information that the government already has, thus improving program integrity at the same time.

Given the significant benefits from improving the operation of government programs and services, reducing burdens across public benefits programs is a priority of the Biden Administration, including for OIRA. Through its implementation of the PRA, OIRA is charged with ensuring that the Federal government minimizes the burdens that fall on members of the public through government forms.[14] When doing so, the PRA specifically directs OIRA to place "particular emphasis on those individuals and entities most adversely affected,"[15] including the families, small businesses, and workers discussed above.

In 2022, OIRA announced a new initiative to use its authority under the PRA to more accurately estimate the administrative burdens imposed on the public and work collaboratively with Federal agencies to reduce unnecessary burdens. This work leverages OIRA's roles reviewing information collections under the PRA and regulations under Executive Order 12866 to help reduce unnecessary

13. General Services Administration, Office of Evaluation Sciences, Streamlining Income Verification to Broaden Access to Rental Assistance, February 6, 2024: https://oes.gsa.gov/assets/abstracts/2305-streamlining-income-verification-to-broaden-access-to-rental-assistance.pdf.

14. 44 U.S.C. §§ 3501(1), 3504(c)(3).

15. 44 U.S.C. § 3504(c)(3).

administrative 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.[16] 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. Last year, in 2023, OIRA summarized work on over 100 burden reduction initiatives across 20 Federal agencies, highlighting seven significant burden reduction initiatives that particularly exemplified the best practices OIRA outlined in its guidance.[17] The initiatives highlighted in this year's report reflect OIRA's continued collaboration with agencies to identify and undertake high-value burden reduction initiatives, informed by its ongoing review of agency's information collections and regulations.

In this year's Burden Reduction report, we summarize 49 burden reduction initiatives across 18 Federal agencies. We also provide detailed descriptions of eight significant burden reduction initiatives that use the leading practices OIRA outlined in its guidance.

This report, like our previous Burden Reduction report, represents one step towards a Federal government that provides public benefits programs to the public without unnecessary burdens. OIRA strives every day to make ever more progress towards that goal.

16. 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.

17. OMB, Tackling the Time Tax: How the Federal Government is Reducing Burdens to Accessing Critical Benefits and Services, July 2023: https://www.whitehouse.gov/wp-content/uploads/2023/07/OIRA-2023-Burden-Reduction-Report.pdf.

Section 2

Agency Burden Reduction Initiatives

Agency Burden Reduction Initiatives

Medicaid Process Improvements (Department of Health and Human Services & Office of Management and Budget)

The Medicaid and Children's Health Insurance Program (CHIP) programs provide essential health care coverage to millions of low-income children, pregnant women, adults, people with disabilities, and older adults, covering a broad array of health benefits and services. For example, Medicaid pays for approximately 42 percent of all births in the U.S.[18] and is the largest payer of services to treat substance use disorder[19] and to prevent and treat the Human Immunodeficiency Virus (HIV).[20]

During the COVID-19 public health emergency, states were required to maintain enrollment of nearly all Medicaid enrollees in exchange for enhanced Medicaid funding. This requirement ended on March 31, 2023, and state Medicaid agencies began to resume eligibility determinations, requiring millions of individuals to complete an annual eligibility renewal — either for the very first time, or the first time in many years. State Medicaid agencies and frontline eligibility workers faced challenges such as existing renewal backlogs, managing growing caseloads, and training new staff.

To tackle these challenges and to make it easier for eligible people to renew their coverage, the Department of Health and Human Services' Center for

18. Centers for Disease Control, National Center for Health Statistics, Births: Final Data for 2022, 72 National Vital Statistics Reports, April 4, 2024: https://www.cdc.gov/nchs/data/nvsr/nvsr73/nvsr73-02.pdf (page 7).

19. Medicaid and CHIP Payment and Access Commission, Report to Congress on Medicaid and CHIP, Chapter 4: Behavioral Health in the Medicaid Program — People, Use, and Expenditures, June 2015: https://www.macpac.gov/wp-content/uploads/2015/06/Behavioral-Health-in-the-Medicaid-Program%E2%80%94People-Use-and-Expenditures.pdf (page 90); see also Kirsten J. Colello & Isobel Sorenson, Who Pays for Long-Term Services and Supports?, Congressional Research Service, last updated September 19, 2023: https://crsreports.congress.gov/product/pdf/IF/IF10343 (page 1) (detailing how Medicaid is the largest payer of long-term services and supports more broadly, including services for individuals managing substance abuse).

20. Lindsey Dawson & Jennifer Kates, Insurance Coverage and Viral Suppression Among People with HIV, 2018, KFF, September 24, 2020: https://www.kff.org/hivaids/issue-brief/insurance-coverage-and-viral-suppression-among-people-with-hiv-2018/.

Medicaid and CHIP Services (CMCS) worked extensively with state Medicaid agencies to provide guidance on Federal requirements, develop an array of tools and strategies for states to simplify Medicaid renewals, help eligible people maintain coverage, and troubleshoot operational issues. Additionally, CMCS and the U.S. Digital Service (USDS) worked collaboratively with states to reduce unnecessary administrative burdens by improving states' ability to conduct automatic renewals using existing data.

Expanding Automatic ("ex parte") Renewals

States are required by Federal regulation to use information already available to them through existing reliable data sources (e.g., state wage data) to determine whether an individual is still eligible for Medicaid or CHIP before they request the submission of a form back to the state. This process — called "ex parte" or automatic renewals — makes it significantly easier for eligible people to renew their Medicaid and CHIP coverage and is crucial to preventing coverage losses due to administrative burdens. To understand states' needs, capacity, and existing renewal policies related to these automatic renewals, USDS and CMCS conducted interviews with, and assessments of, nearly twenty states.[21] They discovered that there was wide variation in how states were implementing these requirements. While some states renewed coverage for more than 50 percent of their enrollees through the ex parte process, other states were only renewing coverage in this manner for less than 10 percent of enrollees. The difference was meaningful: ex parte renewals reduce the burden on enrollees by eliminating burdensome paperwork, making it easier for eligible people to maintain coverage. These renewals also reduce the burden on state workers by making their processes more efficient, allowing them to focus on more complex cases.

Piloting the Effort, and Scaling it Up

USDS ran its first on-the-ground pilot to address this challenge with Michigan. Together, USDS and CMCS worked alongside state staff and vendors to find ways to improve the renewal software and integrate more data sources, as more data allows for more successful ex parte renewals. These changes more than doubled Michigan's ex parte renewal rate, eliminating burdensome paperwork and protecting health coverage for more than 50,000 eligible Michiganders every month.

21. See USDS, Impact Report 2024, last updated May 12, 2024: https://www.usds.gov/resources/USDS-2024-Impact-Report.pdf (pages 8–9).

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Following the Michigan pilot, the USDS team worked with Hawaii, Wisconsin, California, New York, South Carolina, Kansas, and New Jersey to improve their systems. At the same time, there was a collaborative effort to mobilize and support partners seeking to utilize Federal best practices to improve Medicaid renewals in Alaska, Nebraska, and Pennsylvania, among others.[22]

California: Improving Waiver Implementation

California has implemented 14 waivers approved by CMCS that make use of flexibilities under Medicaid.[23] These include a number of income-based waivers that streamline the process for individuals with certain types of incomes. For example, those who have stable qualifying sources and amounts of income (e.g., retirement, pension income, etc.) need not provide additional income information or documentation in many cases.

California partnered with USDS to automate the application of these income-based waivers in its Medicaid eligibility and enrollment systems. Before the collaboration, California's ex parte rate averaged 34% (June to November 2023) whereas after the software changes were implemented, the ex parte rate increased to 66% (December 2023). Assessed at the same times, California's overall Medicaid disenrollments dropped from 20% to 9%. Each month, these improvements **eliminate burdensome paperwork and renew coverage for nearly 400,000 eligible Californians**. Further, this reduction in burden on eligible enrollees is estimated to **prevent unnecessary coverage loss for nearly 100,000 people each month**.

USDS and CMCS worked alongside state staff to diagnose problems in state renewal systems and rapidly implement improvements. Together, the teams used data to track where eligible enrollees were falling out of the state's renewal process. Using this data, the teams worked to close the most important implementation gaps first. The teams also improved the renewal customer experience by redesigning renewal websites, improving communications and notices, and supporting end-to-end process improvements.

22. U.S. Digital Service – Medicaid Renewals Playbook, 2023: https://usds.github.io/medicaid-renewals-playbook/.

23. See 42 U.S.C. § 1396a(e)(14)(A).

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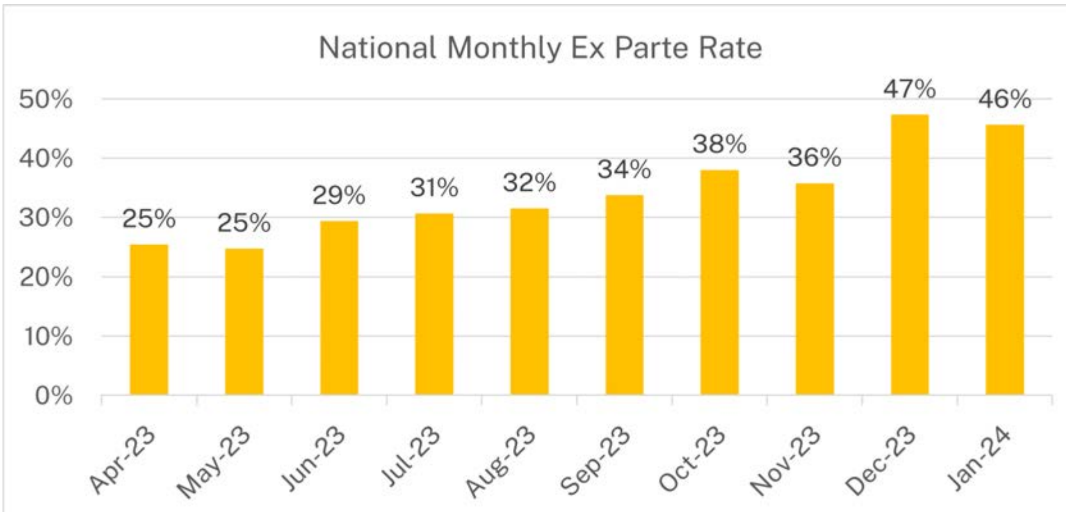
CMCS and USDS's efforts, alongside state Medicaid agencies, have helped to nearly double ex parte renewal rates nationally by the start of 2024: from about 25% in April 2023 to 46% in January 2024.[24]



National ex parte renewal rates have continued to rise, with the most recent data indicating that they reached 50% in April 2024.

Building on key lessons learned during this time, CMCS recently finalized a rule that will streamline and simplify how millions of people enroll in and renew Medicaid and CHIP coverage going forward.[25] It eliminates waiting periods for CHIP coverage, so children can access necessary health care when they need it. It makes it easier for children to be seamlessly transferred from Medicaid to CHIP when their family's income rises. It requires states to provide all applicants with at least 15 days to provide additional information missing from

24. CMS, Medicaid and CHIP National Summary of Renewal Outcomes – February 2024 and National Summary to Date, May 2024: https://www.medicaid.gov/resources-for-states/downloads/february-2024-national-summary-renewal-outcomes.pdf (page 13).

25. Centers for Medicare & Medicaid Services, Medicaid Program; Streamlining the Medicaid, Children's Health Insurance Program, and Basic Health Program Application, Eligibility Determination, Enrollment, and Renewal Processes, 89 Fed. Reg. 22780, June 3, 2024: https://www.federalregister.gov/documents/2024/04/02/2024-06566/medicaid-program-streamlining-the-medicaid-childrens-health-insurance-program-and-basic-health; see also CMS, Biden-Harris Administration Builds on the Success of the Affordable Care Act by Streamlining Enrollment in Medicaid and CHIP Coverage, March 27, 2024: https://www.cms.gov/newsroom/press-releases/biden-harris-administration-builds-success-affordable-care-act-streamlining-enrollment-medicaid-and.

a first application and 30 days to return needed documentation when applying to renew their coverage. And, for older adults and those with disabilities, it prohibits states from conducting renewals more frequently than every 12 months with limited exceptions, and from requiring in-person interviews.

Saving Time and Improving Health

As of January 2024, CMCS and USDS's work with states has resulted in over **1.5 million eligible people** receiving ex parte renewals for Medicaid coverage, and is projected to ex parte renew over **5 million more eligible people in 2024**. Across the eight targeted states, these additional ex parte renewals will cut an estimated **2.5 million hours of paperwork burden for eligible enrollees** and an estimated **2 million hours of processing burden for state workers each year**. As a result, millions of eligible Americans will be able to go to their doctor, get preventative care, and pick up their prescriptions without worrying about their coverage.

Simplifying Taxpayer Notices (Department of the Treasury)

How do people know which form to fill out, or whether they need to complete a form at all? Notices — the letters or correspondence the government sends to constituents — are a critical way that Federal agencies alert individuals about actions they may need to undertake to maintain eligibility for a benefit, request a service, or meet some other requirement. Good notices present clear, actionable choices to recipients, minimizing the learning costs which can otherwise compound administrative burdens.

Simplified Notice Initiative

Few agencies send more letters than the IRS. The agency sends over 200 million notices and letters[26] to taxpayers each year, covering a range of issues from claiming the credits and deductions for which they are eligible to steps to meet tax obligations. But even though these notices are often essential for ensuring citizens can access or meet their obligations, they are often long and difficult for taxpayers to understand. And they do not always clearly and concisely communicate the next steps a taxpayer must take.

In 2022, the agency's five-year strategic plan included a strategy to "develop easy-to-understand tax products and correspondence for effective taxpayer messaging."[27] But it was the funding received through the Inflation Reduction Act that accelerated long-term initiative into a two-year sprint to redesign most of its taxpayer correspondence through the Simple Notice Initiative.

Reducing Burden Through Human-Centered Design

Building on earlier best practices,[28] key principles the IRS incorporated into its early user testing and redesign process included:

- Leading with clear, action-oriented "headlines" which immediately inform recipients about the nature of the correspondence (e.g., "You may be eligible for a refund");
- Ensuring all notices are readable at or below a 5th grade level;

26. See IRS, IRS launches Simple Notice Initiative redesign effort, January 23, 2024: https://www.irs.gov/newsroom/irs-launches-simple-notice-initiative-redesign-effort.

27. IRS, Strategic Plan FY2022-2026: https://www.irs.gov/pub/irs-prior/p3744--2022.pdf.

28. IRS, Behavioral Insights Toolkit: https://www.irs.gov/pub/irs-soi/17rpirsbehavioralinsights.pdf.

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- Breaking up lengthy paragraphs and shift detailed language to irs.gov;
- Attempting to reduce the number of complicated scenarios within a notice, which also improves the IRS's ability to track the outcome of correspondence;
- Leveraging modern font choices, larger font sizes, and the appropriate use of blank space to improve readability.

Piloting the New Notices, Saving Taxpayers Time and Money

One of the first tests IRS undertook was a 60,000-letter comparison (or "A/B") test of the old and revised versions for a letter used to verify the identity of potential filers. The letter, known as 5071C, asks taxpayers to verify their identity and tax return online or over the phone to prevent the processing of fraudulent tax returns. As part of the redesign, the IRS shortened the 5071C letter from seven pages to two pages. The IRS also improved readability of the notice by updating the font and adding visual enhancements such as headers, icons, and step-by-step instructions. The IRS clarified instructions and added a QR code that directs taxpayers to the IRS webpage where they can respond to the notice online instead of responding over the phone.

Compared to those who received the original notice, there was a 16% reduction in taxpayers who called the IRS as their first action, and a 6% increase in taxpayers who used the online option. By more clearly outlining online, self-service ID verification options and reducing respondent confusion, the IRS estimates the use of the redesigned form reduced the average cost of the first-interaction the taxpayer undertakes by approximately 15%, potentially representing hundreds of thousands of dollars in time saved by the agency as well as time saved by the individual recipients.

Accelerating from Pilot to Deployment

With the support of IRA funding, in time for filing season 2024 the IRS reviewed and redesigned 31 notices representing a volume of approximately 20 million notices. These include notices to taxpayers who served in combat zones and may therefore be eligible for tax deferment, notices that remind a taxpayer that they may have unfiled returns, and notices that remind a taxpayer about their balance due and where they can go for assistance.

By filing season 2025, the IRS anticipates it will review and redesign the most common notices that individual taxpayers receive, focusing on up to

200 notices that make up about 90% of total notice volume sent to individual taxpayers (about 150 million notices annually). These include notices to propose adjustments to a taxpayer's income, payments, credits, or deductions; correct mistakes on a taxpayer's tax return; provide awareness of potential eligibility for credits not claimed; and remind a taxpayer of taxes owed.

Lowering Learning Costs, Improving Outcomes

The IRS will also increase the number of notices viewable (when applicable) to individual taxpayers through their individual online account later this year. Allowing taxpayers to view applicable notices in a digital setting — similar to interactions a taxpayer might have with a bank — substantially reduces burden. It also will help disrupt scams by allowing a taxpayer to validate that paper notices they received in the mail is actually from the IRS. A good notice goes a long way towards imbuing confidence in and reducing burden when interacting with the government. The Simple Notice Initiative is a win-win for taxpayers, tax professionals, and IRS employees by reducing questions and headaches for taxpayers, helping combat scams by allowing taxpayers to confirm online that a notice or letter is real, and reducing taxpayer phone calls and visits, freeing up IRS staff to help others.

AGENCY BURDEN REDUCTION INITIATIVES

Simplifying Reporting Requirements for Supplemental Security Income Recipients (Social Security Administration)

For certain programs, like the Social Security Administration's Supplemental Security Income (SSI) program,[29] maintaining eligibility can involve providing the government frequent updates regarding any changes in income, assets, and even where the recipient is living and who they are living with. SSI provides income support to disabled children, disabled adults, and older Americans with little or no income or resources. Without SSI, many of the most vulnerable members of our society would not be able to afford basic necessities such as food or shelter.

SSI monthly payment amounts fluctuate depending on a recipient's income. To determine eligibility for SSI and the amount of monthly SSI payments, SSA is required by the Social Security Act not only to consider a recipient's income and resources, but also to calculate the value of certain non-monetary forms of income, including any in-kind support and maintenance (ISM) they receive. Historically, ISM rules required a recipient to report any food or shelter support provided by family, friends, or others because they might be sources of ISM.[30] For example, recipients were required to report if they lived in someone else's home and who that person was, or to tell SSA if someone was providing them with regular meals. Even items like a spare room offered by a friend or meals gifted regularly by a grandparent could be classified as ISM, and could potentially affect eligibility for or the amount of SSI payments.

Through public engagement efforts, SSA heard that SSI recipients found ISM policies and documentation to be some of the most difficult requirements of the SSI program. Recipients did not always know which type of living or food support arrangements they were required to report, they found it difficult to understand why some types of family or friend help should decrease their payments, and they were at times unable to produce adequate documentation of their ISM. ISM calculations similarly taxed SSA employee resources: employees were frequently called on to spend considerable time seeking evidence of, soliciting documentation for, and ultimately establishing the fair market value of ISM items.

29. See 20 C.F.R. §§ 416.1130–416.1145.
30. See 20 C.F.R. § 416.1131.

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To better align its ISM rules with the real-world situations faced by SSI recipients, and to significantly reduce the time and stress burdens associated with ISM, in 2024 SSA finalized three regulations to simplify and streamline ISM policy.

Removing Food from ISM Reporting

First, SSA revised its regulations so the agency would no longer consider the act of receiving free food from friends or family to be a form of ISM.[31] In making this change, SSA acknowledged that food reporting was complex and burdensome. The reporting requirement had unintended negative consequences, including leading eligible individuals to forgo applying for benefits.[32] Without this change, free food from friends or family counted as a form of ISM, while public sources of food (such as Supplemental Nutrition Assistance Program, or SNAP) did not. This policy change ensures consistent treatment of food assistance, simplifies reporting, and reduces variability in monthly payment amounts, while also increasing program take-up.

Furthermore, SSA highlighted the distinct psychological costs of food reporting. SSA acknowledged that questioning individuals about something as personal as food could be seen as too intrusive. Moreover, the previous policy of categorizing food, a “common human generosity,”[33] as something that must be reported might cause SSI recipients to experience frustration, anxiety, or other forms of discomfort. As with the complexity of the reporting requirement, the psychological costs of reporting food as ISM might ultimately result in people choosing not to apply for SSI. As SSA noted, the change “has the potential to make our rules less intrusive and better protect beneficiaries’ privacy and dignity while continuing to meet the requirements of the program.”[34]

SSA also identified downstream burdens it hopes to reduce in other areas by removing food as an ISM factor. First, SSA emphasized the challenges and time burden SSA faces when it must reach out to other members of the household to confirm the Food ISM estimates initially provided by the SSI claimant. Second,

31. SSA, Omitting Food From In-Kind Support and Maintenance Calculations, 89 Fed. Reg. 21199, March 27, 2024 https://www.federalregister.gov/documents/2024/03/27/2024-06464/omitting-food-from-in-kind-support-and-maintenance-calculations.

32. SSA, Omitting Food From In-Kind Support and Maintenance Calculations, 88 Fed. Reg. 9779, 9785, February 15, 2023: https://www.federalregister.gov/documents/2023/02/15/2023-02731/omitting-food-from-in-kind-support-and-maintenance-calculations.

33. Ibid. at 9787.

34. Ibid.

SSA noted that this change reduces the likelihood of inadvertent overpayments, lessening burdens associated with the overpayment recovery processes.[35]

Expanding the Rental Subsidy Policy

In a second ISM reform, SSA expanded nationwide an exception already in place in seven states due to court agreements.[36] Under this policy, if SSI recipients pay a monthly rent equal to or exceeding a certain amount, then SSA does not consider them to be receiving ISM (in the form of subsidized rent). As a result of this policy change, the agency will avoid having to conduct tens of thousands of assessments of the current market rental value of rental arrangements each year. This change will result in roughly 41,000 SSI beneficiaries seeing an average increase in their monthly SSI payments of $132, and another 14,000 individuals newly qualifying for SSI each year. SSA estimates that by reducing the need to evaluate the ISM policy in these circumstances, it will **save $1 million in annual administrative costs**, freeing up SSA personnel to assist other people in need.

Expanding the Definition of a Public Assistance Household

A third ISM reform regulation changes how SSA classifies the household in which an SSI recipient lives, and updates which public-assistance programs the members of a household can receive to affect that classification. While the ISM policy generally requires the agency to reduce SSI payments by as much as one-third if the recipient receives shelter support from others, a longstanding exception to this policy permits SSA to not count ISM received by others in the household when the beneficiary lives in a household where everyone receives "public assistance." Under the 1980 regulation in which SSA established this policy and outlined which programs it determines to be "public assistance,"[37] the agency reasoned that if another government agency had already found a household's collective need to be so great that its members all required public assistance, then the person from this household applying for SSI should not have their payments reduced due to ISM requirements.

35. Ibid. at 9786.

36. SSA, Expansion of the Rental Subsidy Policy for Supplemental Security Income (SSI) Applicants and Recipients, 89 Fed. Reg. 25507, April 11, 2024: https://www.federalregister.gov/documents/2024/04/11/2024-07675/expansion-of-the-rental-subsidy-policy-for-supplemental-security-income-ssi-applicants-and.

37. SSA, Supplemental Security Income for the Aged, Blind, and Disabled, 45 Fed. Reg. 65541, October 3, 1980: https://archives.federalregister.gov/issue_slice/1980/10/3/65540-65559.pdf#page=2.

However, in the intervening years, certain government assistance programs SSA had originally identified in the 1980 regulation, such as state-based cash assistance and Aid to Families with Dependent Children (AFDC, later replaced by Temporary Aid for Needy Families, or TANF), became significantly less prevalent. In contrast, benefits programs which were relatively new or limited in 1980 expanded to become integral aspects of the social safety net, where they serve as more effective indicators of in-need households. For these reasons, SSA revisited both how it classifies a "public assistance household" and the programs it looks at when determining if a household meets this definition.

First, SSA changed its regulations to add SNAP to its list of public assistance programs in the ISM rules. As SSA explained, today many more in-need families are able to receive SNAP compared to AFDC/TANF.[38] Second, SSA redefined what constitutes a "public assistance household." for the purposes of deciding if ISM from other household members applies. In the 1980 regulation, the agency required all members of a household to receive public assistance to be classified as a "public assistance household." In this new rule, SSA redefined a "public assistance household" to be any household that includes both an SSI recipient and at least one other household member who receives at least one of the listed public assistance programs. This significantly reduces burden on SSI recipients, who will no longer need to gather evidentiary requirements and provide documentation for every member of their household to demonstrate public assistance household status.

Conclusion

SSA's three ISM regulatory reforms not only effected more inclusive policy that better reflects the realities SSI recipients face, they also significantly reduced burden on SSI recipients in multiple ways. First, because of these reforms, approximately one-fourth — or nearly 200,000 — of the recipients who were charged for ISM under the prior rules will no longer be charged for ISM at all under the new rules. These SSI recipients will not need to search for, provide, or document any ISM-related evidence. Second, for those recipients who still need to provide evidence of ISM, the required documentation will be streamlined. In total, the three new rules collectively save nearly **200,000 hours of the public's time**. And that figure does not account for any additional burden savings achieved by avoiding accidental overpayments.

38. SSA, Expand the Definition of a Public Assistance Household, 88 Fed. Reg. 67148, 67152, September 29, 2023: https://www.federalregister.gov/documents/2023/09/29/2023-21550expand-the-definition-of-a-public-assistance-household.

AGENCY BURDEN REDUCTION INITIATIVES

MySBA (Small Business Administration)

The Small Business Administration (SBA) administers loan, certification, and entrepreneurial development programs meant to help individuals and small businesses. During the COVID-19 pandemic, SBA disbursed $1.2 trillion in financial assistance to more than 13 million small businesses, and the agency provides more than $2 billion in direct, low-interest loans to homeowners and small businesses harmed by natural disasters annually.

However, antiquated systems and inconsistent standards or methods of qualifying for assistance has historically placed unnecessary burden on small businesses eligible for SBA's programs and services. This meant wasted hours for businesses that overcame these administrative burdens, and unclaimed benefits for businesses that did not. SBA's outdated systems and policies came under additional stress during the agency's response to the COVID-19 pandemic, which required it to do more — and act more swiftly — than ever before. Building on those lessons, SBA stood up an agency-wide customer experience initiative called "MySBA" to tackle the various sources of unnecessary administrative burdens across program areas through IT modernization, streamlined processes, and policy change.

Building MySBA Loans

Previously, those who received SBA loan assistance in the aftermath of a disaster would either make loan payments by check or through the Pay.gov online payment platform. However, many Americans no longer use paper checks and the Pay.gov portal was unable to adequately handle the volume of payments that SBA knew would come in as a result of the new COVID-19 Economic Injury Disaster Loan (EIDL) program. In response, SBA set up MySBA Loans in 2022 to provide an online means for COVID-19 EIDL borrowers to manage and repay their loans.[39]

MySBA Loans provides all direct SBA borrowers a one-stop-shop to perform loan actions and obtain access to SBA's direct loan programs. Within MySBA Loans, borrowers can automate recurring payments, check statements and tax information, and auto-enroll in hardship accommodation plans to lower their monthly payments temporarily. SBA has processed over **13 million payments** related to the COVID-19 EIDL program through the platform and supports over **2.5 million actively registered users**.

39. SBA, MySBA Loan Portal: https://lending.sba.gov/.

Reducing Administrative Burden Through Regulation

In June 2023, SBA issued a final rule that reduced administrative burden on SBA borrowers eligible for support following a disaster.[40] For example, the rule extended the first payment deferment period from 5 to 12 months for all disaster loans.[41] This change removes the burden for disaster survivors to begin making payments on their disaster loans before communities rebuild and recover, while "not hav[ing] a significant impact on the overall subsidy rate" of the program.[42] The rule also removed the requirement that businesses submit financial statements with every reconsideration or appeal request for a previously declined application.[43] Previously, SBA required business loan applicants to provide current financial statements, even if their applications were not declined for lack of repayment ability, and therefore those financial statements were not relevant to the reconsideration request.

In December 2023, SBA built on these policy changes by transitioning its disaster lending service delivery to MySBA Loans. So far, SBA has processed over 70,000 loans in the new platform. The application is completely digital, including integrated document management, and includes a fully digital way to close natural disaster loans. The new loan process takes 16.8 minutes to complete on average — a substantial reduction in burden — and can be completed entirely on a mobile phone. The platform also includes several business process improvements that allow SBA to more efficiently process applications. As a result, the average time from application to decision has been reduced to 16 days, down 43% from the previous 28-day average. MySBA Loans has also improved the average disbursement times on secured loans **from over 105 days to 30 days**, a dramatic improvement in providing rapid relief to disaster victims.

Building on Success with Further Unification and Simplification

Currently, SBA's four small business certification programs — VetCert, 8a, HUBZone, and Women Owned Small Business (WOSB) — are administered

40. SBA, Disaster Assistance Loan Program Changes to Maximum Loan Amounts and Miscellaneous Updates, 88 Fed. Reg. 39335, June 16, 2023: https://www.federalregister.gov/documents/2023/06/16/2023-12779/disaster-assistance-loan-program-changes-to-maximum-loan-amounts-and-miscellaneous-updates.

41. Id. at 39336.

42. Id. at 39339.

43. Id. at 39336.

across three platforms, each with a distinct application and compliance process, and with inconsistent procedures for review of applications. While an estimated forty percent of certified small businesses are eligible for multiple certifications, only ten percent currently hold more than one certification, due in part to the heavy burden of applying for and maintaining certifications. It is not uncommon for small businesses to hire consultants to help with their applications and reporting requirements, resulting in firms paying hundreds or thousands of dollars to access a program that should be free, and less-well-resourced firms being effectively shut out.

This summer, SBA will launch MySBA Certifications, a platform providing small businesses with the ability to apply for and manage all of SBA's small business certifications in one place. MySBA Certifications will leverage existing user data to support account creation, make it easier for firms currently certified in one program to obtain any additional certifications for which they are eligible, and allow firms to apply for multiple certifications at once. SBA is also making policy changes to simplify the application process, align many of the requirements across the four certification programs, and reduce the number of required documents. The agency estimates that the time it takes to complete an application will be reduced by 40% for a firm seeking a single certification and up to 70% for a firm seeking multiple certifications. The single portal will also allow the agency to realign resources to support and standardize program operations, reducing the average processing time of a WOSB or 8(a) application by 60-80%. The agency will also align reporting requirements for multiple certification holders, allowing firms to submit a single recertification package to retain multiple certifications, thereby significantly reducing the time required for continued compliance. Ultimately, a unified application and certification management experience will reduce the burden on small businesses and support SBA's goal of growing the base of certified small business Federal contractors. SBA aims to double the number of firms with multiple certifications from 10% to 20% within the first year.

And to ensure that the Certification Portal does not introduce unnecessary administrative burden, this summer SBA will also launch the MySBA customer portal, which will serve as a single point-of-entry for small businesses' online interactions with SBA. The portal will integrate the MySBA Certifications and MySBA Loans, so that customers can see all their loans and certifications in one place, and seamlessly transition between services from a central account. A user's home page will also include curated content, helping guide small businesses toward additional SBA programs or online or in-person resources that may be relevant to them: Lender Match,[44] entrepreneurial development e-learning modules, technical assistance providers, and more. The MySBA portal will be a paired with a new, agency-wide companion customer relationship management platform. This will give SBA employees a complete view of each program beneficiary or potential beneficiary, enabling better customer service and more tailored recommendations and technical assistance.

44. See SBA, Lender Match Connects You to Lenders, last updated April 4, 2024: https://www.sba.gov/funding-programs/loans/lender-match-connects-you-lenders.

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Reducing Burdens in Grantmaking (Department of Health and Human Services and U.S. Agency for International Development)

Notices of funding opportunities (NOFOs) help individuals and organizations apply for and receive Federal grants. But complicated NOFOs can effectively close off these funding opportunities to certain eligible applicants, particularly those with limited organizational capacity. To address these problems, agencies are working on simplifying their NOFOs. Two agencies that are setting an example are the Department of Health and Human Services (HHS) and the Agency for International Development (USAID).

HHS

HHS began in 2022 by analyzing a random sample of 200 previous HHS grant announcements. It found that its NOFOs were too long and difficult:

- 95% required **college graduate level reading ability**[45];
- An average of **9 additional non-standard forms or attachments** were required to be filled out per application;
- Each NOFO on average was **35,630 words long**, totaling **54 pages**.

HHS supplemented its analysis of 200 NOFOs with 16 focus groups made up of 54 HHS program staff and 6 applicants, and a user experience study that included in-depth interviews of 10 applicants for grant programs and five grantors.

HHS's analytic work led it to develop four prototype simplified and redesigned NOFOs with four HHS agencies: the Administration for Community Living, Administration for Children and Families, Centers for Disease Control and Prevention, and Substance Abuse and Mental Health Services Administration. The evaluation for these prototypes collected quantitative and qualitative feedback from both HHS staff and external participants, including NOFO applicants.

Sample prototypes show the remarkable difference between the old approach and the new one (which is still in progress):

45. According to the SMOG Readability Formula. See Amy S. Hedman, Using SMOG Formula to Revise a Health-Related Document, 39 American Journal of Health Education, 2008.

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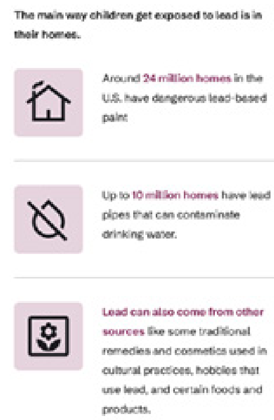
Original:

Significant progress has been made in reducing population exposures to lead in the United States due, in large part, to successful policies aimed at the removal of lead in gasoline and control of lead in residential paint and consumer products. Nonetheless, no safe blood lead level (BLL) has been identified, and hundreds of thousands of U.S. children still have BLLs that are unacceptably high. More effective testing (see Glossary for blood lead screening definition) and follow-up is needed and must be focused where children at highest risk are most likely to benefit. Young children are particularly vulnerable to the long-term health and developmental effects of lead exposure including intellectual and behavioral deficits. The primary source of lead exposure to United States children is the home environment: some 24 million homes have significant lead-based paint hazards https://www.hud.gov/sites/dfiles/HH/documents/AHHS_II_Lead_Findings_Report_Final_29oct21.pdf and up to 10 million homes have lead service lines and/or plumbing that may result in exposure to lead from drinking water (FACT SHEET: The Biden-Harris Lead Pipe and Paint Action Plan | The White House). Deteriorating paint, depositions from leaded gasoline, hazardous waste sites, and industrial emissions can also create lead hazards in dust and soil in and around the home. In addition, children may be exposed through other sources (e.g., consumer products or foods decorated or made with lead, workplace hazards brought home from the job, certain traditional remedies and cosmetics used in cultural practices, lead-based hobbies or recreational activities). Primary prevention – the removal of lead hazards from the environment before a child is exposed – is the most effective way to ensure that children do not experience the harmful effects of lead exposure. However, blood lead testing and secondary prevention strategies remain an essential safety net for children who may be exposed to lead. Children from households experiencing lower incomes and from some racial and ethnic minority groups bear a disproportionate burden of lead exposure risk and significant disparities in BLLs exist by race/ethnicity, poverty status, and geographic location. Public health action is needed to improve health equity by supporting strategies and activities to eliminate disparities in BLLs by social, demographic, and geographic factors and, ultimately, eliminate childhood lead poisoning as a public health problem.

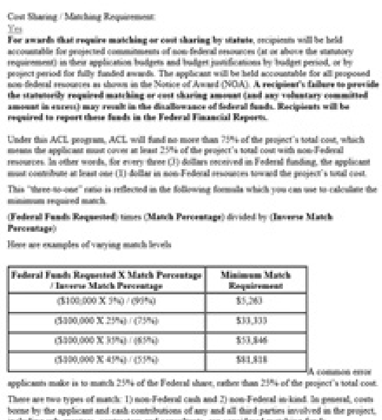
Because of the deep partnership building, dedication, representation and built credibility and trust, organizations that support or represent a community or certain populations within a community are important partners in providing a tailored and successful approach to reduce or eliminate risk of lead exposure in underserved communities and eliminate disparities in blood lead levels by race, ethnicity, socioeconomic status, geography, or other factors.

This NOFO supports approaches to establish and strengthen community-based organization's (CBO) efforts to identify and engage with multi-sector partners, enhance access for children and families and community partners to resources and services, enhance skills and knowledge of community members of childhood lead poisoning as a public health problem, and educate and inform the community about risk of lead exposure and disparities in blood lead levels by race, ethnicity, socioeconomic status, geography, or other factors.

Prototype:



Original:



Cost Sharing / Matching Requirement:

Yes

For awards that require matching or cost sharing by statute, recipients will be held accountable for projected commitments of non-federal resources (at or above the statutory requirement) in their application budgets and budget justifications by budget period, or by project period for fully funded awards. The applicant will be held accountable for all proposed non-federal resources as shown in the Notice of Award (NOA). **A recipient's failure to provide the statutorily required matching or cost sharing amount (and any voluntary committed amount in excess) may result in the disallowance of federal funds. Recipients will be required to report these funds in the Federal Financial Reports.**

Under this ACL program, ACL will fund no more than 75% of the project's total cost, which means the applicant must cover at least 25% of the project's total cost with non-Federal resources. In other words, for every three (3) dollars received in Federal funding, the applicant must contribute at least one (1) dollar in non-Federal resources toward the project's total cost.

This "three-to-one" ratio is reflected in the following formula which you can use to calculate the minimum required match.

(Federal Funds Requested) times (**Match Percentage**) divided by (**Inverse Match Percentage**)

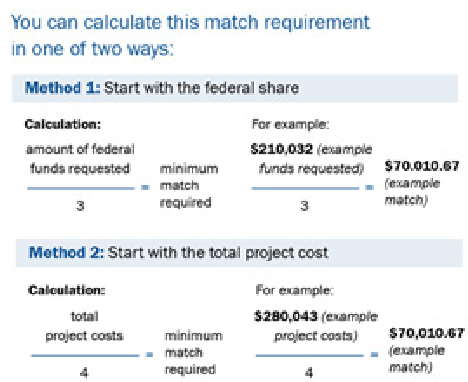
Here are examples of varying match levels

Federal Funds Requested X Match Percentage / Inverse Match Percentage	Minimum Match Requirement
($100,000 X 5%) / (95%)	$5,263
($100,000 X 25%) / (75%)	$33,333
($100,000 X 35%) / (65%)	$53,846
($100,000 X 45%) / (55%)	$81,818

A common error applicants make is to match 25% of the Federal share, rather than 25% of the project's total cost.

There are two types of match: 1) non-Federal cash and 2) non-Federal in-kind. In general, costs borne by the applicant and cash contributions of any and all third parties involved in the project, including sub-grantees, contractors and consultants, are considered matching funds.

Prototype:



These early prototypes have shown promise. Across the four, the result was an average of **60% fewer words**, a **25% reduction in reading level** (from college sophomore to 10th grade), **40% shorter sentences**, **27% fewer pages**, and a **31% reduction in application time** on average compared to standard NOFOs. Qualitative feedback on these prototypes in user testing has also been strongly positive.

Based on this experience with the four prototypes, HHS has made progress on a number of process improvements:

- It has developed NOFO writing guides and training to encourage the use of plain and welcoming language.
- It has redesigned documents following best principles to improve the user experience and readability.

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- It is making efforts to consolidate and centralize HHS-required “boilerplate” language to simplify and shorten that language, and either delete non-essential information from the NOFO or move it into links and appendixes.
- It is producing trainings to educate NOFO writers on plain language best practices and the revised NOFO process.

Now, HHS is piloting and testing this approach by applying it to approximately 80 additional grant announcements within eight operating divisions, with aims to continue to scale up in the coming years to eventually include all HHS grant announcements.

USAID

To better understand the challenges that potential partners — organizations that USAID works with to fulfill its mission — face, USAID issues an annual partner experience survey. Now in its second year, the survey is available to past, current, and potential USAID partners. The 2023 survey asked seven questions designed to help USAID identify barriers to participation and failures to adopt best practices.[46]

Through the survey, USAID identified a number of burdens affecting USAID’s partners, and the Agency has begun work to remedy them, as described below:

- Local entities reported that complicated regulations required significant technical knowledge to navigate. To address this concern, USAID has undertaken efforts to raise awareness of — and increasing use of — available flexibilities related to these processes. USAID pursued this via regional webinars and in-person support to help local partners make use of these flexibilities.

- A number of local entities reported that identifying USAID funding opportunities is itself a barrier, due to a lack of clarity about where to search for them across different official U.S. government websites. To address this, USAID created WorkwithUSAID.gov: a live feed of all of its funding opportunities across these websites, allowing local partners to

46. See Matthew Johnson, Results of the 2023 Partner Experience Survey, USAID, November 2, 2023: https://www.workwithusaid.gov/blog/results-of-the-2023-partner-experience-survey.

check only one place for all USAID funding opportunities.[47] USAID also launched a portal for receiving and reviewing unsolicited applications and proposals on WorkwithUSAID.gov with a set of standardized fields to reduce burden on partners. The new platform will also send automated updates to partners regarding the acceptance status of their unsolicited proposals and applications, increasing transparency and accountability in this process.

- Some local organizations indicated that they were deterred from applying for grants because of the time and other costs involved in understanding and translating complex funding opportunities from English into local languages. Similarly, local organizations also indicated that they incur substantial time and other costs translating applications drafted in other languages into English before submitting applications to USAID. To help increase the number of awards that go towards local partners, USAID established a program to translate assistance award documents such as Requests for Information, Requests for Application, Notices of Funding Opportunities (NOFOs), amendments to NOFOs, SAM.gov Unique Entity Identifier (UEI) registration documents, and other assistance award documents into 9 languages. These languages together cover 70% of the countries USAID operates in, and include Amharic, Arabic, Chichewa, French, Hausa, Portuguese, Somali, Spanish, and Swahili. The program is designed to reduce burdens on local organizations and also level the playing field among all potential applicants. USAID has also begun to establish a repository of translated USAID standard award language, so more potential local partners can access these same materials in their native languages.[48]

- Many local entities are deterred from responding to solicitations because of their length. Because such long applications are often unnecessary, USAID has recommended that grant opportunities require only an initial concept paper (five pages or fewer) in response to a NOFO, rather than the full application up front. USAID has also encouraged the use of oral presentations as an evaluation method, rather than long written applications and proposals for both grants and contracts. This helps reduce burden on

47. See Elizabeth Van Flandern & Ethan Biederman, Introducing the Funding Feed: A One-Stop-Shop for USAID Funding Opportunities, USAID, December 13, 2023: https://www.workwithusaid.gov/blog/introducing-the-funding-feed-a-one-stop-shop-for-usaid-funding-opportunities.

48. See Hans Faye, USAID Translation Program Saves Partners Time and Money, USAID, May 14, 2024: https://www.workwithusaid.gov/en/blog/usaid-translation-program-saves-partners-time-and-money.

partners and USAID staff.[49]

- Partners have highlighted the burden that excessive reporting requirements present. To address this feedback, USAID has encouraged staff to eliminate any excessive reporting above and beyond what is statutorily required and any reporting that does not help with performance or financial oversight.

- Private sector partners often are required to go through due diligence multiple times when working with USAID, because of how decentralized the Agency's programs and operations are. USAID is addressing this concern through the creation of an enterprise customer relationship management system that will allow USAID staff a single, global source of information about engagements and partnerships with the private sector. This will include a repository of previously-completed due diligence documents and other relevant risk management background information, which will streamline the pre-partnership process and avoid unnecessary repetition.[50]

Many of USAID's efforts have already resulted in burden reductions. For example, USAID's push to require only a short initial concept paper (five pages or fewer) in response to a notice of funding opportunity has yielded quick results; in Peru, this new streamlined application process allowed USAID to quickly provide assistance to individuals under its health programs, issuing awards to three new local partners in **three months**, a process that typically takes **10 months**.

49. See USAID, 2023 Updated Equity Action Plan, February 15, 2024: https://www.usaid.gov/sites/default/files/2024-02/2024%20EAP_2023_.pdf (page 6).

50. See GSA, Technology Modernization Fund Announces Targeted Investments in Improving Customer Experiences for the Public, December 19, 2022: https://www.gsa.gov/about-us/newsroom/news-releases/technology-modernization-fund-announces-targeted-investments-in-improving-customer-experiences-for-the-public-12192022.

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Institutionalizing NOFO Simplification Across Government

Building on the work at HHS, USAID, and other agencies, OMB is leading a whole of government effort to scale NOFO simplification efforts to reduce the burden on applicants for Federal funds. Specifically, the updated Uniform Grants Guidance[51], released in April 2024, and the related implementation memo M-24-11 (Reducing Burden in the Administration of Federal Financial Assistance) require that agencies "increase accessibility, readability, clarity, and design of their NOFOs."[52] As a result, each grantmaking agency is required to develop a plan for the first set of NOFOs for competitive grant programs that it will simplify starting in Fiscal Year 2025. Over the coming years, as these efforts grow to encompass all competitive Federal grants, they will be particularly focused on limited capacity applicants.

51. OMB, Chief Financial Officers Council, Uniform Guidance: Title 2 of the Code of Federal Regulations: https://www.cfo.gov/resources/uniform-guidance/.

52. OMB, M-24-11, Reducing Burden in the Administration of Federal Financial Assistance, April 4, 2024: https://www.whitehouse.gov/wp-content/uploads/2024/04/M-24-11-Revisions-to-2-CFR.pdf. OIRA, the office of the Deputy Director for Management, and the Resource Management Offices all play a role in reviewing and improving NOFOs.

Federal-State Cooperation: Reducing Burden in Nutrition Assistance Programs (Department of Agriculture)

The Supplemental Nutrition Assistance Program (SNAP), administered by the U.S. Department of Agriculture (USDA), is the nation's largest domestic food assistance program for Americans, reaching about 42 million people (approximately 13 percent of the nation's population) per month during fiscal year 2023.[53]

Although the Federal government funds SNAP benefits, state agencies are responsible for general program administration of SNAP within their states, including determining the eligibility of individuals and households to receive SNAP benefits and issuing monthly allotments of benefits. Burden reduction requires a partnership between the Federal program and the State partners that administer SNAP.

Working with States To Realize Improvements

Accordingly, USDA has coordinated with states on ways states can reduce administrative burdens in SNAP and related programs, including:

- Participating in demonstration projects to give elderly and disabled households the choice of using a standard medical expense deduction instead of verifying all actual medical costs.[54] As of June 2024, twenty-five states have implemented a standard medical deduction project.
- Simplifying reporting requirements and assigning the longest certification periods of 12 months for most households and up to 36 months for some older adults and individuals with disabilities.
- Streamlining eligibility verification processes by reusing data that was already provided to other state agencies to verify eligibility and

53. Jordan W. Jones & Saied Toossi, The Food and Nutrition Assistance Landscape: Fiscal Year 2023 Annual Report, U.S. Department of Agriculture, Economic Research Service, June 2024: https://www.ers.usda.gov/webdocs/publications/109314/eib-274.pdf?v=4060.1.

54. See USDA Food and Nutrition Service, SNAP Special Rules for the Elderly or Disabled: Frequently Asked Questions, last updated June 10, 2024: https://www.fns.usda.gov/snap/eligibility/elderly-disabled-special-rules.

circumstances, via data sharing agreements.[55]

- Implementing new flexibilities in the Special Supplemental Nutrition Program for Woman, Infants, and Children (WIC) that allow for more flexibility in providing services remotely to increase convenience, such as allowing for WIC benefits and nutrition education to be delivered virtually.[56]

USDA has also coordinated with states on how they can reduce administrative burdens on those eligible for these programs through inter-program coordination, such as by:

- Implementing data sharing agreements to allow state agencies that administer Medicaid, TANF, and SNAP to automatically enroll eligible people in WIC.[57]
- Aligning asset limits for SNAP Households with TANF-funded benefits to reduce the burden of providing numerous verifications for the same data that add time and complexity to the eligibility determination process, and to avoid discouraging households from building savings that support financial security.

The Department has seen a great deal of success in its coordination with state partners. Forty-four states (including territories and the District of Columbia) have implemented broad-based categorical eligibility — that allows the state to align asset or gross income limits across programs — by increasing the SNAP income eligibility threshold, aligning the SNAP resource limit, or both. Beneficiaries must still go through the application process and meet all other SNAP requirements. This option reduces administrative complexity for states and smooths what can otherwise be a dramatic benefits cliff for families very close to the income eligibility threshold, encouraging work. It also encourages savings, allowing families that have managed to save a modest amount to preserve their hard-earned savings and still receive food assistance if they face

55. See The White House, Fact Sheet: The Biden-Harris Administration Highlights Recent Successes in Improving Customer Service and Delivery for Safety Net Benefits; Identifies Opportunities for States for Further Improvement, April 9, 2024: https://www.whitehouse.gov/briefing-room/statements-releases/2024/04/09/fact-sheet-the-biden-harris-administration-highlights-recent-successes-in-improving-customer-service-and-delivery-for-safety-net-benefits-identifies-opportunities-for-states-for-further-improvement.

56. Id.

57. Department of Agriculture, Economic Research Service, WIC Policy Memorandum #2023-5: Data Sharing to Improve Outreach and Streamline Certification in WIC, April 25, 2023: https://www.fns.usda.gov/wic/data-sharing.

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an unexpected cost or loss of income. The flexibility provided by this option also simplifies the SNAP application process for both states and for households in need. This also streamlines caseload processing and brings additional Federal funding into eligible communities.

Reducing Burden in Presidential Pardons Requests (Department of Justice)

A Presidential pardon can be the ultimate act of rehabilitation and reentry for individuals returning to their communities post-incarceration. The task of requesting a pardon is personal, vulnerable, and long. It requires the individual to demonstrate good conduct for a substantial period of time after conviction and service of sentence. It also requires the government to evaluate the applicant's standing in the community, their need for relief (such as to restore voting rights or the ability to pursue a professional license), their acceptance of responsibility, remorse, and atonement, and their criminal history.

But the form to capture this vital information was historically intimidating. "When I first began reading through the current application," wrote one pardon applicant, "I was somewhat overwhelmed and wondered if I could do this on my own or if I should hire an attorney for assistance."[58] Another noted "I got a stomachache and a headache just looking through the pardon application form." And research suggests such perceptions may be common. An analysis of presidential pardons released in 2021 by the RAND Corporation found that about eight out of ten application packages were incomplete or unresponsive.[59]

Understanding Psychological Costs in Forms

Perhaps most notably, a unique burden many individuals felt about the pardon application process was that the information requested on the form would be used against the applicant by the government. Part of this perception came from the structure of the form; after collecting basic biographic information, the first three pages of the form were dedicated exclusively to probing questions about the applicant's criminal history, deferring questions about the applicant's current character until later in the application. Other questions, such as a series intended to document how the criminal conviction continued to negatively affect professional licensing or the exercising of civil rights, were instead perceived by some applicants as a requirement to disclose information that might then be held against them.

58. These quotes were collected as part of a research project conducted by the Department of Justice Office of the Pardon Attorney. For context, see Agency Information Collection Activities; Proposed eCollection eComments Requested; New Collection; Application for Pardon After Completion of Sentence, 88 Fed. Reg. 78390, November 15, 2023: https://www.federalregister.gov/documents/2023/11/15/2023-25178/agency-information-collection-activities-proposed-ecollection-ecomments-requested-new-collection.

59. Nicholas M. Pace et al., Statistical Analysis of Presidential Pardons, RAND Corporation, June 2021: https://www.ojp.gov/pdffiles1/bjs/grants/300116.pdf (page 64).

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These represented major sources of psychological costs — administrative burdens beyond just time or financial cost that were caused, in this case, by the apprehension of having to respond to certain questions which applicants perceived as intrusive or even susceptible to resulting in further punishment. And so while the Department of Justice (DOJ), which assists the President on pardon matters, continues to have a strong interest in ensuring the application process robustly documents the applicant's post-incarceration life and character, the agency sought to redesign the form in a way that better empowers applicants to shape their narrative while providing greater clarity regarding the purpose of the information collected.

Improving the Pardon Petition

Following months of internal subject matter expert consultation, usability testing, and stakeholder engagement, DOJ revised the form to make significant changes.[60] As one pardon applicant noted after reviewing the revised petition, "I believe that my application would have greatly benefitted if I had been aware of the new draft form...the revisions are true improvements."[61]

- **Leading with the applicant's narrative**: The form now begins with questions related to the applicant's reason for seeking the pardon and their involvement and investment in the community, instead of leading with questions about their criminal history. This allows the applicant to center the application around who they are today instead of who they were when they committed their offense.
- **Setting time limits for certain reporting requirements**: The old form required applicants to list every location lived at and every job held since exiting incarceration. DOJ had found, however, that applicants often struggled to recall every residence and every job, resulting in technical deficiencies and added follow-up during the pardon investigation. This risked being particularly harmful to disadvantaged applicants with frequent changes in where they lived or jobs held. To improve this, the new pardon petitions now limits respondents to only providing seven years of employment history and three years of housing history.
- **Eliminating notarization requirements**: The old form required notarized

60. DOJ Office of Public Affairs, The Office of the Pardon Attorney Releases New Presidential Pardon Application, June 10, 2024: https://www.justice.gov/opa/pr/office-pardon-attorney-releases-new-presidential-pardon-application.

61. This quote was collected as part of a research project conducted by the Department of Justice Office of the Pardon Attorney. For context, see 88 Fed. Reg. 78390.

statements from not just the applicant, but each character witness submitting a statement in favor of the applicant. DOJ regularly found that applicants failed to understand the requirement to get these statements notarized and in the revised form it eliminated all notarization requirements.

- **Explaining sensitive questions**: There are still questions on the form that some applicants may view as sensitive or difficult to answer. But through improved instructions and "tips" on each section, DOJ now uses the form to better explain to respondents how this information is used and, importantly, sympathizes with applicants about potential challenges associated with providing this information. For example, in the "financial information" section of the form, which includes questions regarding the applicant's debt or potential bankruptcy history, DOJ opens by stating: "We know that criminal convictions may affect some people's ability to get a job and may carry heavy financial penalties, making it harder to keep up with necessary expenses. We know this can be a hard subject to discuss. Your honest reflection is helpful to us."[62]
- **Improving plain language**: Overall, DOJ implemented these changes, including adding improved instructions and guidance, while reducing the overall length of the application by six pages, reducing the word count by more-than 30%, reducing the sentence length by more than 25%, and reducing the reading grade level from 13.2 to 10.6.

Expanding the Use of Human-Centered Design To Improve Access to Justice

Reforming the pardon petition was a collaboration between the DOJ Office of the Pardon Attorney and the DOJ Office for Access to Justice (ATJ), with support from the Lab at OPM (Office of Personnel Management). ATJ recently launched the Access DOJ initiative to extend this model of human-centered design and access to justice research to other programs across the Department.[63] Through this initiative, ATJ will serve as a hub and resource for components wishing to improve DOJ services using a people-centered approach to simplification.

62. DOJ Office of the Pardon Attorney, Application for Pardon After Completion of Sentence, May 2024: https://www.justice.gov/pardon/file/960581/dl (page 14).

63. DOJ Office of Public Affairs, Justice Department Launches Access DOJ, June 7, 2024: https://www.justice.gov/opa/pr/justice-department-launches-access-doj.

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Streamlining Employment Eligibility Verification (Department of Homeland Security)

Hiring new workers is an exciting milestone for both employers and their prospective employees. American businesses and their workers play a vital role in the success of the United States by driving economic growth, fostering innovation, and contributing to community well-being. Ensuring that employers and employees can easily understand and quickly navigate Federal government forms to comply with legal requirements is critically important.

Simplifying Employment Eligibility Verification with E-Verify

Since the passage of the Immigration Reform and Control Act (IRCA) of 1986, all U.S. employers are required to complete the Form I-9, Employment Eligibility Verification, to verify that their new hires are legally authorized to work in the United States.[64] Failure to complete the Form I-9 or knowingly hiring unauthorized workers can have serious consequences for employers, including civil monetary penalties or even jail time. Employees must also sign the form and attest that the information they provided is true and correct.

Since 1997, E-Verify has been helping U.S. employers minimize the risk of hiring unauthorized workers by making it easier to confirm the validity of employees' employment eligibility documents.[65] Through E-Verify, an employee's Form I-9 information is manually entered by the employer and compared with records available to the U.S. Department of Homeland Security (DHS) and the Social Security Administration (SSA). Submitting data from an employee's Form I-9 through E-Verify is particularly useful because many employers may not feel equipped to spot fraudulent identification or employment authorization documents on their own. E-Verify has helped employers more confidently make hiring decisions and avoid potential violations.

About 1.25 million U.S. employers are currently enrolled in E-Verify and more that 350,000 employers have used it in the past year to confirm that their new employees are eligible to work in the United States. In Fiscal Year (FY) 2023, over 11,000 new businesses of all sizes signed up for E-Verify every month, and almost 45 million new hires were quickly screened for employment

64. DHS Office of Public Affairs, Form I-9 Inspection Overview, December 1, 2009: https://www.ice.gov/doclib/news/library/factsheets/pdf/i9-inspection.pdf.

65. See DHS, History and Milestones, last updated May 4, 2023: https://www.e-verify.gov/about-e-verify/history-and-milestones#y1997.

eligibility using E-Verify. Comparing E-Verify to Bureau of Labor Statistics data, an estimated 60% of all new hires in the US in FY 2023, were screened for employment eligibility using E-Verify,[66] allowing employers to confidently move forward with their onboarding as workers quickly and seamlessly enter the workforce.

Identifying Existing Challenges

E-Verify relies on employers' time and effort to read employee-related information on the Form I-9 and then manually input that data into the E-Verify system. However, employers entering strings of unfamiliar numbers (e.g., employees' Social Security Numbers, passport numbers) are prone to human error that may lead to data mismatches, which, in turn, place undue burden on employees to resolve. Even when mismatches occur for valid reasons — like a name change that has not been recorded with the government — resolving these mismatches often requires *the employee* to travel to an SSA field office, which can be time consuming, difficult, and stressful for many people. When data mismatches or discrepancies are not addressed in a timely and effective manner, an employer may terminate the employee. And while employees legally have the right to resolve their mismatch, that does not mean all employers are correctly following the guidelines to allow employees to do so, nor does it mean that employees are comfortable calling — or even able to call — DHS or travel to an SSA office to resolve a mismatch.

For a high-use form like the I-9, data entry issues can quickly add up to burdensome outcomes. For example, in FY 2023, 6.5% of E-Verify cases had data entry errors as a result of manual entry by the employer. Of these, 3% — amounting to roughly 420,000 prospective employees — had data mismatches that required the employer, the employee, SSA, and USCIS to take additional, time-consuming actions in order to resolve the discrepancies and complete the verification process.

To address the burdensome back and forth between employers and employees, reduce data entry errors, and empower employees to have more ownership over their employment eligibility, USCIS conducted robust stakeholder engagement and usability testing — with a focus on human-centered design — in order to better understand the needs of a typical user and identify potential solutions to the overall employment eligibility verification process.

66. See U.S. Bureau of Labor and Statistics, Job Openings and Labor Turnover Survey (JOLTS) 2023 data, https://www.bls.gov/jlt/data.htm.

Robust Public Engagement to Inform Changes

Through interviews with individuals representing employers and employees, USCIS heard how information mismatches created anxiety and psychological costs for their employees starting a new job. Employees were confused about terms used in the E-Verify response messaging, such as "Tentative Nonconfirmation" or "TNC," the formal term for a data mismatch. They did not feel equipped to resolve mismatches, nor did they feel it should be their responsibility to try to explain to a new employer whether they had resolved the issue — especially when the mismatch was a result of the employer's own data entry error.

For example, one trucking company mentioned that a mismatch meant they had to call someone from another state in to the home office to resolve the error. This cost the new trucker time and money at a time when obtaining a new job was critical to their family's wellbeing. Stories like these helped the team at USCIS launch a prototype that enhanced the E-Verify process to, among other things, mitigate mismatches caused by data entry errors and relieve burden and anxiety on employees.

Before launching the prototype, the team conducted three rounds of usability testing with various employees and employers from diverse industries. Across these three rounds, the team conducted over 60 usability testing sessions ranging from 30 to 60 minutes with participants in the employee user group. The users' insights and feedback were aggregated and used to make modifications to existing functionality or to create new features in E-Verify+. The team collected roughly 1,600 pieces of feedback to consider in the development of E-Verify+.

Building on Previous Success with E-Verify+

Taking this stakeholder feedback, USCIS launched a trial of E-Verify+ as a streamlined employment eligibility verification service that combines the Form I-9 and E-Verify into one seamless digital process to make the employment eligibility verification process work better for both employers and employees.[67]

Importantly, E-Verify+ **empowers employees** to electronically input their own information for Form I-9 and receive updates as their employer finalizes the process:

67. DHS, E-Verify+: The "Plus" Means More for Employment Eligibility Verification!, April 11, 2024: https://www.e-verify.gov/about-e-verify/whats-new/e-verify-the-plus-means-more-for-employment-eligibility-verification

- The digital Form I-9 is now added to E-Verify, which means employees can now use any mobile or internet-connected device to complete the Form I-9 and upload supporting documents in a secure, protected environment. Employees can electronically enter their own personal information to better support privacy, security, and more accurate results and reduce the number of mismatches caused by data entry errors by employers.
- In addition to allowing employees to enter their own I-9 data directly into E-Verify, mismatch alerts are first delivered to employees, rather than to the employer. If a mismatch occurs, employees receive immediate notice so they can resolve mismatches on their own without employer intervention and before referral to an SSA field office.
- Employees' employment eligibility can be reconfirmed and carried through to future employment with E-Verify+ participating employers, **eliminating the need for employees to repeatedly complete the Form I-9** from scratch in many cases.

E-Verify+ also supports employee rights by allowing employees to upload the documents they choose directly to the system and allowing employers to remotely examine their employees' documentation — a significant benefit for both employees and businesses that hire remote workers or have remote human resources processes.

Reducing Burden Through Human-Centered Design

E-Verify+ was released in Spring 2024 to a small diverse cross-section of employers, representing the broader population, to evaluate the E-Verify+ experience.[68] The goal of this limited release is to validate the assumptions made during development, prioritize enhancements, scale for greater volume, and ensure E-Verify+ is the best possible experience prior to widespread availability coming later in 2024.

Through a thoughtful and phased approach to product development, the E-Verify+ team continues to design and deliver a service that meets the needs of the public and makes it easier for millions of employers and employees to fulfill their Form I-9 and employment eligibility verification requirements, helping ensure that navigating government and legal requirements in the new hire process is as stress-free as possible.

68. DHS, Announcing the E-Verify+ Trial Launch!, May 29, 2024: https://www.e-verify.gov/about-e-verify/whats-new/announcing-the-e-verify-trial-launch.

Updates On the 2023 Burden Reduction Report's Burden Reducing Initiatives

Overview

In the 2023 report, we summarized over 100 burden reduction initiatives across 20 Federal agencies. In more detail, we discussed six significant burden reduction initiatives that used the leading practices OIRA outlined in our guidance:

- 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 eligible individuals 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 highlighted another seven specific initiatives achieving significant burden reduction, as well as three cross-cutting agency initiatives embedding burden reduction values across their agencies' workforces.

AGENCY BURDEN REDUCTION INITIATIVES

Agencies have made significant strides in following through on these initiatives. We summarize just a few of these efforts below.

U.S. Agency for International Development: Internal Efficiencies

The 2023 report discussed the commitment of the U.S. Agency for International Development (USAID) to continue its work tackling the burdens stemming from unnecessary processes or documentation requirements borne by agency staff. These *internal* administrative burdens can hamper an agency's ability to serve the public by redirecting staff time to paperwork from more impactful activities. USAID pledged a goal of eliminating **3 million person hours** (one hour per day for each member of USAID's global workforce, over 13,000 people) in burdensome administrative and programmatic processes per year by the end of the fiscal year 2023.[69] USAID beat that target, saving **3,830,293 person hours** in all. It accomplished this work in a number of ways, with illustrative examples below:

- USAID collaborated with the Department of State to address numerous burdens that affect both agencies. For instance:
    - Budget teams at USAID and the Department of State worked together and streamlined complicated foreign assistance funds approval processes guidance for the first time in a decade, resulting in time savings of 4,000 person hours a year. This enables USAID to provide support more quickly to partner countries.
    - USAID's Bureau for Global Health also worked with the Department of State's Office of the U.S. Global AIDS Coordinator to save 678,528 person hours per year simply by shifting the annual process of preparing operational plans to an every-two-years schedule. This empowers staff to focus on the work that matters most to control HIV in partner countries.
- USAID eliminated a time-consuming senior leadership review process, the Senior Obligation Alignment Review, for awards above the $50 million and below the $100 million range. This change resulted in time savings of 795 person hours, and crucially, eliminated 19 business days per award from the process, without sacrificing essential oversight.
- USAID conducted a comprehensive review of all 33 USAID policies and retired 11 policies, resulting in time savings of 343,860 person hours for staff

69. USAID, Policy Framework: Driving Progress Beyond Programs, March 2023: https://www.usaid.gov/sites/default/files/2023-05/Policy%20Framework%20%28V16%29%2005-04-2023_2.pdf (page 41).

responsible for compliance and reporting against said policies.

- USAID developed concise, customer-friendly travel guidance laying out various steps of the travel process, rather than the previous siloed standard operating procedures. USAID also launched a pilot to streamline travel approvals in the E2 electronic travel system.

USAID has been focused on creating a culture of burden reduction and has taken significant steps to implement this through the following tools:

- USAID created Administrator-level awards for burden reduction and process improvement.
- USAID launched a Burden Busters of the Year annual competition, modeled on the Partnership for Public Service's Samuel J. Heyman Service to America Medals, in order to recognize staff innovation in burden reduction.
- USAID worked with both its Foreign Service and Civil Service unions to negotiate updated skills and competencies lists that include burden reduction and customer service.
- USAID launched a peer learning series to share best practices to bust burdens and improve processes across the Agency.

In addition to the work USAID had already taken, USAID also launched the next phase of its Burden Reduction Program to tackle external burdens that affect its implementing partners, private sector partners, and job applicants.

Social Security Administration: Online Continuing Disability Review

The Social Security Act requires SSA to periodically evaluate current beneficiaries and recipients and determine if they continue to meet SSA's disability criteria. SSA uses medical Continuing Disability Reviews (CDRs) for this purpose. As highlighted in the 2023 Burden Reduction report, in 2023 SSA made available to the public the i454, a new online CDR platform that allowed a subset of beneficiaries and recipients to complete the CDR process online. The i454 provided the agency's first online CDR platform, and also substantially simplified the information collection requirements of the standard CDR form.

In the last 12 months, SSA reports that **over 59,000 individuals successfully completed the CDR online**. The agency anticipates this number will continue to increase as more recipients become aware of this option and are scheduled to undergo CDRs. Besides offering the convenience of an online form, the i454 has proven to be a considerable burden reduction tool for both the affected public and SSA employees. Recipients who used the i454 **saved an estimated 45 minutes** in comparison to the standard paper and in-office versions of the forms. This savings reflects the pre-populated and streamlined data fields offered by the i454, as well as the ability to avoid a visit to a field office. Similarly, SSA employees no longer need to manually key in the CDR information from a paper form or interview into SSA's internal systems. Because of this efficiency, SSA estimates that the transcription time savings alone from the past year has resulted in nearly **$2.4 million in annual savings, or 22 person work years** that can be dedicated to other complex workloads.

Department of Homeland Security: Improving the Disaster Assistance Experience

The Department of Homeland Security took myriad actions to realize its goal of reducing paperwork burden on the public by 20 million hours of across all of its programs. In this year's report, we focus in particular on how the Federal Emergency Management Agency (FEMA) took action to reduce unnecessary burdens for those recovering from disaster.

Earlier this year, FEMA released a final rule that made the most significant update to their disaster assistance program in twenty years to improve the experience of survivors.[70] Among other substantial changes, the rule simplified application processes and requirements to remove barriers on applicants and speed up the delivery of benefits. For example, the rule eliminated a requirement for survivors to apply and be rejected for a SBA Disaster Loan before receiving certain benefits. FEMA estimates this change **saves survivors a total of 51,300 hours annually**, increases the number of survivors receiving benefits by 214,000, and speeds up benefit delivery by an average of 33.6 days.

Further, FEMA's rule simplified the application process by eliminating documentation requirements for those seeking continued temporary housing assistance, allowing for more late applicants and removing the need to provide a signed, written letter to appeal a benefit decision.

This streamlining of the application requirements was completed in conjunction with FEMA's update of its own online application, DisassterAssistance.gov. FEMA leveraged public feedback and usability testing to make their online application easier to navigate, understand and complete. For most disaster survivors, this

70. FEMA, Individual Assistance Program Equity, 89 Fed. Reg. 3990, Jan. 22, 2024: https://www.federalregister.gov/documents/2024/01/22/2024-00677/individual-assistance-program-equity.

change is expected to **reduce the time that it takes to register for assistance by more than 15%.**

Department of Agriculture: Farm 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.

In OIRA's 2023 report, USDA discussed its newly revised 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 consolidated those 10 forms into a single 13-page document. The new form is estimated to take under three hours to complete — an estimated burden reduction of nearly 50%. In addition to simplifying the form itself, the report discussed the Department's newly-released online Loan Assistance Tool that guides farmers through the process of determining their eligibility and submitting their application with easy-to-navigate prompts. The 2023 report noted that USDA has committed to couple these tools with additional enhancements. And since that report, the Department has continued to expand efforts in a number of areas, two of which are discussed below.

1. Farm Service Agency: Farm Loan Program Application Improvements and Increased Access

In December 2023, USDA launched an online application for Direct Loan customers.[71] More than 26,000 customers who submit a Direct Loan application each year can now use an online, interactive, guided application that is paperless and provides helpful features including an electronic signature option, the ability to attach supporting documents such as tax returns, complete a balance sheet, and build a farm operating plan. This tool is part of a broader effort by USDA's Farm Service Agency (FSA) to streamline its processes, improve customer service, and expand credit access.

The online farm loan application replicates the support an applicant would receive when completing a loan application in person with an FSA Farm Loan

71. USDA Farm Service Agency, USDA Now Accepting Applications for Farm Loans Online, December 5, 2023: https://www.fsa.usda.gov/news-room/news-releases/2023/usda-now-accepting-applications-for-farm-loans-online.

Officer, while continuing to provide customers with one-on-one assistance as needed. This tool and other process improvements allow farmers and ranchers to submit complete loan applications 24/7 and reduce the number of incomplete and withdrawn applications.

For the initial stage, the online application tool has been available only for producers who will be, or currently are, operating their farm as an individual. FSA is expanding the tools availability to married couples applying jointly and other legal entities later in 2024. When feasible, the Farm Loan Program is also interested in translating the loan assistance tool and online loan application into Spanish — among other languages — to reduce barriers to access for all customers.

2. Rural Development: Value Added Producer Grant Application and Process Improvement

The Value Added Producer Grant (VAPG) program is part of the Local Agriculture Market Program (LAMP) in USDA, which helps agricultural producers enter value-added activities to generate new products, create and expand marketing opportunities, and increase producer income. Eligible applicants include independent producers (includes harvesters and steering committees), agricultural producer groups, farmer-or rancher-cooperatives, and majority-controlled producer-based business ventures. As of June 20, 2024, there are over 2,500 VAPG program grants with a combined total of over $360 million investments.[72]

Since VAPG is a competitive program, scores received are based on the quality of the applicant's responses. Simply addressing the criteria will not guarantee a higher score and many customers may finish the lengthy applicant but are ultimately not eligible.

The Department is developing a streamlined application process specifically implementing a simplified application for smaller award requests and online application tools which will lead to less time spent on the application for the applicant, more eligible applicants applying, and faster staff review time. These changes should reduce application package preparation time, application packet review, and the percent of scorable applications.

72. USDA Rural Development, Rural Investments in Program Areas: Grants and Loans by Program, last accessed June 20, 2024: https://www.rd.usda.gov/rural-data-gateway/rural-investments/program-areas.

Conclusion

This report captures only a small fraction of the burden reduction efforts underway across the Federal government; many more initiatives are still being developed. As OIRA continues its work to reduce unnecessary administrative burdens, it continues to identify new priorities. One is the importance of partnering with, and facilitating the actions of, states that jointly administer programs alongside Federal agencies. As reflected in this report's discussion of HHS and USDS's work with states to reduce burdens on those eligible for Medicaid and CHIP, as well as the Department of Agriculture's work with states to reduce burdens on those eligible for SNAP and WIC, agencies are already exemplifying how this work can be effectively undertaken.

Another priority is aligning eligibility criteria across multiple programs intended to benefit similar populations. This report's discussion of the Small Business Administration's efforts through its MySBA initiative and the Social Security Administration's programmatic changes provide useful examples that other agencies may learn from in this area.

OIRA looks forward to continuing to work closely with its Federal agency partners and benefit from public input as to how it can quickly and effectively reduce unnecessary administrative burdens.