

Comment from Senior Fellow John Kamensky on *Identifying and Reducing Burdens in Administrative Processes*  
October 13, 2023

Overall, the research report is very good and provides excellent, readable context for supporting the draft recommendations. Following are some specific comments for potential discussion:

- Line 2 Will assume “administrative burdens” and “the public” will be defined in the Preamble.
- Line 12 Can we discuss use of “do not” vs. “weigh the costs and benefits of”?
- Line 16 Should we add something about disabled individuals? The National Council on Disability may have some perspective on these kinds of issues.
- Lines 29-31 This section does not address the cumulative effects of burden being imposed by various agencies. Burdens by individual agencies/programs may be viewed as tolerable, but cumulatively they may be problematic (e.g., different administrative/ legal interpretations of acceptable documentation for identify between agencies/programs).
- Line 33 Should “. . . compliance, and . . .” be “. . . compliance, and/or. . .”?
- Line 36 “Agencies should periodically review. . . “ - so it is clear that this isn’t a one-time thing.
- Line 40 Should this be expanded in some way (or an additional subsection) to include the use of standard or common documentation across different programs?
- Line 47 Is the intent to “allow individuals” or is the intent for agencies to “adopt Login.gov” (or equivalent) as a default by agencies? . . . is this to be a passive recommendation or an active recommendation?
- Line 85 “Agencies should incorporate . . .” or should they “include?” . . . also, what about including other guardians of institutional stakeholders like PRA, Risk officers, CIO, CDO, Privacy, Ombuds? More than lawyers can stymie progress!
- Line 90 This isn’t quite right. Cross-Agency Priority Goals are set and overseen by OMB, not agencies. Agencies have Agency Priority Goals. A current CAP goal on CX does span lots of agencies, but this is driven by OMB and not the agencies. Do you mean for these to be incorporated into APGs?
- Line 100 “Agencies should establish . . .” Feels too much like immaculate conception. Need to make it actionable by putting someone/some institution in charge/held accountable.

Line 112 Please expand on what you mean by “clarify specific elements.” No need to change; just need to educate the reader!

Line 114 “. . . expands on flexibilities . . .” is vague. Maybe cite ACUS Recommendation 2012-4 on Paperwork Reduction Act (<https://www.acus.gov/sites/default/files/documents/Final-Recommendation-2012-4-Paperwork-Reduction-Act.pdf>) . . . For example, Rec. 4 recommends OMB delegating limited approval authority to agencies instead of everything funneling through OIRA.