

Comments from Eric Schultz, ICR Officer at the Environmental Protection Agency
March 29, 2018

Comment 1: I'd contend that common forms are not used much because they are not very useful. It may be the case that there may be many forms out there that collect many duplicate or similar data elements, but forcefully pressuring agencies to use common forms doesn't sound like the right answer. That would seem to compel those agencies to use forms that are not well tailored to their specific needs -- thereby creating instances where unnecessary data is collected and/or data quality is not maximized. It seems this issue would be best handled at the level of data elements. This will become increasingly easier as we move away from thinking of "forms" as discrete documents (in the hard-copy sense) and start seeing them more as an amalgam of data elements (in the sense of a web interface that may serve as a front end to multiple data destinations). Earlier today, the CAPRA folks just saw a demo (just mentioned as I'm writing this) of a tool that would help support such an initiative.

Comment 2: More important than having a central database of free-text forms (final or not) -- which incidentally, does not exist except in the sense that ROCIS/Reginfo.gov can be searched -- OIRA should be asking for data elements collected to be named and submitted in a standardized way as part of the ICR development and approval process.

Comment 3: The versions of forms currently on Reginfo.gov do not include any changes that may occur as a result of conversations between the Agency and the OIRA Desk Officer after the initial ICR package is submitted in ROCIS.