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ADMINISTRATOR  
OFFICE OF  
INFORMATION AND  
REGULATORY AFFAIRS

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MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES,  
AND OF THE INDEPENDENT REGULATORY COMMISSIONS

FROM: Cass R. Sunstein   
Administrator, Office of Information and Regulatory Affairs

SUBJECT: Testing and Simplifying Federal Forms

To carry out their functions, Federal agencies must often ask members of the public to provide information by filling out forms (including applications to obtain permits, licenses, benefits, and grants). If poorly designed or unduly complex, such forms and their accompanying instructions can prove difficult and confusing, especially for individuals and small businesses. Unnecessarily burdensome paperwork requirements can undermine economic and other goals.

With respect to Federal forms, simplicity and ease of comprehension are exceedingly important. In recent years, agencies have made important efforts to simplify and streamline forms and, where appropriate, to eliminate them. Despite these efforts, it is a continuing challenge for agencies to minimize complexity and confusion. The purpose of this memorandum is to help agencies to meet that challenge by testing whether forms are sufficiently clear and comprehensible.

The Paperwork Reduction Act of 1995 (PRA) sets forth the responsibilities that Federal agencies must fulfill when seeking to collect information from the public. The PRA's requirements include reducing the burden on those asked to provide the information. In addition, the PRA generally requires agencies to provide an opportunity for public comment.

To the extent feasible and appropriate, especially for complex or lengthy forms, agencies shall engage in advance testing of information collections, including Federal forms, in order (1) to ensure that they are not unnecessarily complex, burdensome, or confusing, (2) to obtain the best available information about the likely burdens on members of the public (including small businesses), and (3) to identify ways to reduce burdens and to increase simplification and ease of comprehension. Such advance testing should occur either before proposing information collections to the public or during the public comment period required by the PRA.

Advance testing might take the form of focus groups,<sup>1</sup> in-person observations of users' perceptions of the forms and questions (cognitive testing), web-based experiments, and randomized controlled experiments. When renewing information collection requests, agencies shall, to the extent feasible and appropriate, compile actual evidence about the burden imposed by those requests, and refine or simplify the requests on the basis of such evidence.

Information about testing information collections may be found in OMB's Guidance on Agency Survey and Statistical Information Collections. Guidance on obtaining and using a mechanism under the PRA to conduct advance testing of forms may be found in Paperwork Reduction Act – Generic Clearances.

If you have questions, please contact your agency's desk officer within OMB's Office of Information and Regulatory Affairs.

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<sup>1</sup> Agencies may request approvals for focus groups and other types of public consultations through the "Fast-Track Process." OMB published a FAQs document to help explain this approval process.