



Homeland
Security

March 22, 2022

MEMORANDUM FOR: DHS Component and Office Heads

FROM: Eric Hysen
Chief Information Officer

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SUBJECT: **Paperwork Reduction Act Burden Reduction Initiative**

The Paperwork Reduction Act (PRA) governs how federal agencies collect information from the public. On December 13, 2021, the President issued Executive Order (EO) 14058, *Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*, directing agencies to improve the overall experience for customers accessing government services and benefits. As Chief Information Officer, I am responsible for both PRA and Customer Experience EO implementation across DHS.¹

The EO emphasizes that paperwork requirements and other administrative burdens can operate as “time taxes” and impose “systemic barriers to opportunities and benefits.” The EO states:

In recent years, the annual paperwork burden imposed by executive departments and agencies (agencies) on the public has been in excess of 9 billion hours. That number is too high. Agencies must work with the Congress; the private sector and nonprofit organizations; State, local, Tribal, and territorial governments; and other partners to design experiences with the Federal Government that effectively reduce administrative burdens, simplify both public-facing and internal processes to improve efficiency, and empower the Federal workforce to solve problems.

The Federal Government must design and deliver services in a manner that people of all abilities can navigate. We must use technology to modernize Government and implement services that are simple to use, accessible, equitable, protective, transparent, and responsive for all people of the United States.

As Secretary Mayorkas said upon the signing of the EO, “The Department of Homeland Security is committed to ensuring the public can seamlessly interact with its agencies and offices and is taking key steps to reduce administrative burdens and improve efficiency, equity, and accessibility throughout the customer experience.”² DHS interacts more frequently with the public than any other federal agency, from travelers passing through our air, land, and sea ports of entry to businesses importing goods into the country to noncitizens applying for benefits. Through these interactions, DHS imposes over 190 million hours of paperwork burden on the

¹ Delegation No. 04000, “*Delegation to the Chief Information Officer*” and Delegation No. 04005, “*Delegation of Authority to the Chief Information Officer to Implement Executive Order 14058 Regarding Customer Experience*”

² [Statement from Secretary Mayorkas on President Biden’s Customer Experience Executive Order | Homeland Security \(dhs.gov\)](#)

public each year. Reducing this burden, and thus eliminating “time taxes,” is a key component of improving overall customer experience and rebuilding trust in government. DHS is establishing a target of reducing this public burden by at least **20-million-hours agency-wide by May 30, 2023**. The following table identifies current PRA burden hours, as well as target reductions.

DHS Component	Current Burden Hours ³	Target Reduction in Burden Hours	Target Burden Hours
CISA	639,278	67,258	572,020
FEMA	25,494,822	2,682,279	22,812,543
TSA	9,943,233	1,046,115	8,897,118
CBP	60,182,216	6,331,697	53,850,519
USCG	3,875,403	407,727	3,467,676
USCIS	82,173,255	8,645,347	73,527,908
ICE	5,768,408	606,887	5,161,521
S&T	200,390	21,083	179,307
HQ	2,021,610	191,608	1,629,612
Total	190,098,225	20,000,000	170,098,225

Component burden reduction strategies should include an initial assessment of targeted and Component-wide actions necessary to achieve this target burden reduction and incorporate, at a minimum, the following best practices.⁴ Following each Component’s submission of its burden reduction strategy, information collection requests that do not follow these best practices will be rejected by my office unless an emergency circumstance merits an exception.

- *Simplification, automatic renewals, and “short form” options.* In some cases, existing forms are unduly complex. Decreasing the number of questions, implementing automatic renewals or direct approvals, and allowing streamlined short forms for situations of lesser complexity can all significantly reduce burden and encourage participation.
- *Enable online submission of all forms, where appropriate.* Well-implemented online forms can reduce burden and save time. They can enable the public to access and complete forms through improved guidance, error checking, simplified navigation, and accessibility improvements, thereby creating a more efficient process. At the same time, maintaining paper and other offline information collection methods (e.g., phone) may be important for maintaining equity in service delivery, and Components should consider equity implications when choosing to eliminate offline options entirely.
- *Accept electronic or digital signatures.* Consistent with the 21st Century Integrated Digital Experience Act (Pub. L. 115-336), which requires agencies to accelerate the use of electronic signatures to reduce burden, the Department should avoid requiring customers to print out, sign, mail and/or fax an official form in order to promote more

³ These figures are current as of January 7, 2022 and are subject to change.

⁴ Components should consult their legal team prior to creating their burden reduction strategies to consider issues such as whether regulatory changes are necessary to implement an ICR change

equitable and efficient services to the public.

- *Ensure that online forms are optimized for mobile devices.* The majority of visits to DHS websites come from mobile devices.⁵ Online forms not designed to be mobile responsive may be unusable, inequitable and increase error rates. This creates additional workload for members of the public and DHS employees. Electronic forms should not use fillable PDFs or similar formats unless there is a reasonable expectation that they would not be completed on a mobile device.
- *Conduct usability testing during the creation and revision process for all forms.*⁶ Usability testing involves evaluating a product or service by testing it with representative users. Section 7(b) of the EO states that “...*the Paperwork Reduction Act does not apply to agencies' general solicitations of public views and feedback, certain ratings and rankings of Federal services by members of the public using Government websites, or direct observations of users interacting with digital tools and products...*”
- *Prepopulate forms and reuse existing known data and information.* Prepopulating form data reduces burden as the public need only review the data to ensure accuracy instead of re-entering the information. Prepopulation will also reduce typos and other errors.⁷
- *Use plain language.* Plain language for form field names, directions, error messages, and help text minimizes burden and helps ensure the form is filled out correctly the first time.
- *Reducing frequency of information collection.* It is possible to reduce paperwork burden by shifting from quarterly to annual reporting requirements. Components might consider whether less frequent reporting meets program needs.
- *Eliminate redundant or unnecessary collections.* In some cases, longstanding requirements have not been carefully scrutinized and may be redundant or no longer necessary in light of regulatory changes. Careful scrutiny of burdensome requirements may reveal some that are no longer necessary, or can be simplified.

Components should submit proposed burden reduction strategies to dhs.pra@hq.dhs.gov within 90 days of issuance of this memorandum. The DHS PRA and Customer Experience teams will review the strategies and provide recommendations within 14 business days of receipt. My teams are also available to help identify resource and support opportunities for your offices.

I look forward to working together to reduce burden on the public and improve the customer experience of DHS. For questions regarding this memorandum, please contact Robert Dorr, Executive Director, Business Management Directorate at robert.dorr@hq.dhs.gov or (202) 849-0569.

⁵ analytics.usa.gov | [The US government's web traffic](https://www.usa.gov/).

⁶ As stated in Executive Order 14058, all program offices are directed to identify opportunities to apply policies to engage in promising practices such as the advance testing of information collections described in the OMB Memorandum of August 9, 2012 (Testing and Simplifying Federal Forms).

⁷ Data and information sharing across programs and Components must follow approved procedures, including privacy and civil rights and civil liberties safeguards.