

this manner third parties such as software companies and intermediaries could where practicable assist small businesses in providing the information in much the same manner that Intuit assists small businesses file their taxes.

*Encourage Agencies to Utilize "Smart" Electronic Forms.* These forms would include components that provide immediate feedback to assure that data being submitted meets requirements of format and are within the range of acceptable options for each data field. This would be similar to the aforementioned tax preparation software. On these programs, if you enter an illegal value in a blank, you are given an immediate error message. Or, if the program finds that you need to fill out a Schedule C, it automatically pops you over to that schedule, you fill it out, and it pops you back to the your form 1040, and translates the data from the Schedule C onto the form 1040. These programs also have handy pop-up windows that explain terms and definitions, and provide cross-references to the regulations. This should be a model of the user friendliness and efficiency that we should strive to implement in government forms. Agencies should accept electronic submission of forms to avoid errors when paper forms are manually transcribed

To this end, we would recommend an evaluation of the following requirements.

(1) When an agency submits a form to OMB for approval and assignment of an "OMB control number," OMB should review the collection for compliance with GPEA. The agencies should provide web services transactions, not just e-copies of paper forms.

(2) Any computation should be built into the form. Data that appears in more than one field should be copied automatically.

(3) The submitting agency should include form field validation parameters at the time that the electronic form is submitted to ensure valid data entry.

(4) All electronic forms should contain instructions in the form of pop-up windows to explain to the user why the form field is invalid as well as definitions of terms, statutes, reference data, and, where applicable, worksheets for computing entries.

Implementing these improved, "smarter" forms will, of course, cost the government time and money. Agencies will have to spend time designing the electronic forms, and determining the validation parameters. OMB will have to spend additional time in reviewing the forms and verifying the completeness of the validation and pop-up help screens. However, the return on investment will

be significant for both governments and businesses.

#### *Critical Success Factors*

The Task Force envisions several critical success factors in achieving the desired paperwork burden reduction and user-friendly compliance assistance:

- Effective collaboration among and between the regulators;
- Commitment of the regulated community and their associations;
- Commitment to developing a critical mass of users, infrastructure and tools to ensure rapid implementation of E-forms;
- Public-private partnerships and use of "best practices" to deliver the tools;
- Use of proven, affordable technologies to deliver compliance assistance to small businesses in a one-stop, single format manner;
- Agreement on appropriate business models to illustrate who funds, develops, owns and maintains the web services;
- Agreement on financing strategy that highlights shared services and clarifies who manages the relationship with the user, controls the data, and owns the transaction.

#### **Appendix 1—44 U.S.C. 3520, Public Law 107-198**

[See <http://www.aces.gov>]

#### **APPENDIX 2.—SMALL BUSINESS PAPERWORK RELIEF TASK FORCE MEMBERS**

Agency	Member	Title
Office of Management and Budget ..	Mark A. Forman .....	Associate Director for Information Technology and E-Government.
Office of Management and Budget ..	John Graham .....	Administrator, Office of Information and Regulatory Affairs.
Department of Labor .....	Dana Barbieri .....	Associate Assistant Secretary for Policy.
Department of Labor .....	Lois Orr .....	Deputy Commissioner, Bureau of Labor Statistics.
Department of Labor .....	Cheryl Kerr .....	Special Assistant to the Commissioner, Bureau of Labor Statistics.
Department of Labor .....	Jeff Koch .....	Special Assistant to the Assistant Secretary for Administration and Management.
Department of Labor .....	Steven Witt .....	Director, Standards and Guidance, Occupational Safety and Health Administration.
Small Business Administration .....	James M. Van Wert .....	Expert Advisor to the Chief Operating Officer.
Small Business Administration .....	David Javdan .....	General Counsel.
Small Business Administration, Office of Advocacy.	Thomas M. Sullivan .....	Chief Counsel for Advocacy.
Department of Transportation .....	Eugene Taylor .....	Acting Chief Information Officer.
Department of Treasury .....	Neil Eisner .....	Assistant General Counsel for Regulations and Enforcement.
Internal Revenue Service .....	Michael R. Chesman .....	Director, Tax Payer Burden Reduction.
Internal Revenue Service .....	Sherrill A. Fields .....	Deputy Director, Tax Payer Education and Communications.
Department of Health and Human Services.	Daniel Troy .....	Associate General Counsel.
Department of Health and Human Services.	Ruben King Shaw .....	Deputy Administrator and Chief Operating Officer, Centers for Medicare and Medicaid Services.
U.S. Department of Agriculture .....	James E. House .....	Director, Small and Disadvantaged Business Utilization.
Department of Interior .....	Robert Faithful .....	Director, Small and Disadvantaged Business Utilization.
General Services Administration .....	Mary Mitchell .....	Acting Deputy Associate Administrator, Electronic Government and Technology.
Environmental Protection Agency ....	Stephanie Daigle .....	Acting Deputy Associate Administrator, Policy, Economics and Innovation.
Environmental Protection Agency ....	Karen Brown .....	Small Business Ombudsman.
Department of Commerce .....	Janet Schwalb .....	Special Assistant to the Chief Financial Officer.
Department of Commerce .....	Karen Hogan .....	Deputy Chief Information Officer.