

APPENDIX 3.—CONTRIBUTING STAFF

Agency	Member	Title
Office of Management and Budget ..	Donald Arbuckle	Deputy Administrator, Office of Information and Regulatory Affairs (OIRA).
Office of Management and Budget ..	Jefferson Hill	Senior Advisor, OIRA.
Office of Management and Budget ..	Stanton Anderson	G2B Portfolio Manager.
Office of Management and Budget ..	Jo Armstrong	SBPRA Project Manager.
Office of Management and Budget ..	Bryon Allen	EPA Desk Officer, OIRA.
Office of Management and Budget ..	David Rostker	SBA Desk Officer, OIRA.
Office of Management and Budget ..	Cristal Thomas	DOL Desk Officer, OIRA.
Environmental Protection Agency	Joan Crawford	Special Assistant, Office of Policy, Economics and Innovation.
Environmental Protection Agency	Sandy Germann	
Environmental Protection Agency	Doreen Sterling	Associate Director, Collection Strategies Division, Office of Information Collection, Office of Environmental Information.
Environmental Protection Agency	Jim Edward	Director, Compliance Assistance and Sector Programs Division.
Environmental Protection Agency	Tracy Back	
Internal Revenue Service	Margie Kinney	Program Analyst, Office of Tax Payer Burden Reduction.
Internal Revenue Service	Ron Kovatch	Senior Advisor, Office of Tax Payer Burden Reduction.
General Services Administration	Frank McDonough	Director, Office of Intergovernmental Solutions.
Department of Health and Human Services.	David Elizalde	Centers for Medicare and Medicaid Services.
Department of Labor	Jennifer Silk	Deputy Director, Standards and Guidance, Occupational Safety and Health Administration.
Department of Labor	Todd Owens	OSHA Clearance Officer.
Department of Labor	David Gray	Deputy Assistant Secretary of Labor.
Small Business Administration	Shawne McGibbon	Deputy Chief Counsel for Advocacy.
Small Business Administration	Suey Howe	Director, Interagency Affairs, Office of Advocacy.
Small Business Administration	Keith Holman	Assistant Chief Counsel, Office of Advocacy.
Small Business Administration	Ernst Nilsson.	

Appendix 4—Results of SBA Office of Advocacy's Outreach Activities

SBA Office of Advocacy Observations Regarding Implementation of the Small Business Paperwork Relief Act of 2002, Based on Comments Submitted to the Office of Advocacy by Small Business Representatives

1. *Single Point of Contact.* Small business representatives stated that a single point of contact for paperwork/information collection requirements within each agency would be extremely beneficial. They recommend that the single point of contact be the Chief Information Officer (CIO) or an analogous official within each agency who is responsible for compliance with the Paperwork Reduction Act (or that person's representative). Small business representatives believe that the single point of contact needs to have sufficient authority and the resources to be able to truly function as a single point of contact. Finally, they suggest that the single point of contact within each agency be clearly identified to the public and to agency personnel. From the Office of Advocacy's experience in communicating with small businesses, the designation of an effective single point of contact within each agency will be critical in achieving the burden relief objectives of the Act.

2. *Overlapping/Duplicative Reporting.* Small business representatives cited the need to repeatedly submit the same information to a single agency as a major paperwork burden. They suggest that agencies periodically review and eliminate duplicative reporting requirements. The single point of contact for paperwork within each agency would be uniquely situated to identify such

overlapping, duplicative reporting requirements and recommend their elimination.

3. *Compliance Assistance.* Small business representatives stated that agencies should provide more effective paperwork compliance assistance to small businesses. Concise, plain-language compliance guides would be helpful. Currently, small business representatives complain about compliance guidance that is complex, outdated, misleading, or voluminous, leaving the small business more confused that when the guidance was first consulted. Small businesses have told the Office of Advocacy that compliance hotlines are also very useful. Certainly, compliance assistance hotlines such as the Internal Revenue Service's Tele-Tax assistance network have proven to be very helpful to regulated entities.

4. *Paperwork Utility Review.* Small business representatives believe that it would be beneficial for agencies to periodically review their information requirements and assess whether the required information is still necessary or even useful.

5. *Catalogue of Required Paperwork Requirements.* Small business representatives stated that a catalogue of reporting requirements would be useful and would enhance their ability to identify and comply with paperwork and information collection requirements. They believe that such a catalogue can and should be categorized by NAICS code. Ultimately, small businesses would like to be able to enter their industry code and see all of the paperwork requirements that apply to them.

6. *Use of Enforcement Discretion.* Small business representatives suggested that agencies waive penalties for first-time paperwork violations, especially where a

small business has sought out and followed advice from a hotline or other agency contact. One suggestion is for agencies to develop a mechanism to track calls to hotlines or other compliance assistance requests (e.g., a confirmation number is provided to the small business at the conclusion of the contact), so that the small business can demonstrate that the contact was made. Agencies can use their existing enforcement discretion on a case-by-case basis to respond to these situations.

7. *Paperwork Retention Requirements.* Small business representatives noted their concern with record retention requirements that may add significantly to the overall paperwork burden. They believe that paperwork retention requirements should be periodically evaluated and unnecessarily long retention periods should be shortened where appropriate.

8. *Electronic Paperwork Reporting.* Small business representatives pointed out that many small businesses still rely on paper, and are unlikely to become computerized in the near future. Agencies should not assume that Web-based paperwork filing is a solution to the paperwork burden.

Summary of Public Comments on Implementing the Small Business Paperwork Relief Act of 2002, Excerpted From the Transcript of a Public Meeting Held March 4, 2003, and Written Comments Submitted to the Office of Advocacy

1. Paperwork Retention Requirements

- "Part of the problem with understanding paperwork on small business is * * * the amount of time that [small businesses] have to spend in collecting the data that back those forms for that data, and certainly retaining that data in a manner in which they're able to replicate it for organizations