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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-182087

July 25, 1980



The Honorable Lawton Chiles, Chairman
Subcommittee on Federal Spending
Practices and Open Government
Committee on Governmental Affairs
United States Senate

SEN 06609

Dear Mr. Chairman:

In response to your request, we have prepared comments on the Subcommittee's proposed substitute bill for S. 1411, dated June 20, 1980, the "Paperwork Reduction Act of 1980." These comments supplement my earlier comments provided October 31, 1979, on S. 1411. The bill would create a central office in the Office of Management and Budget (OMB) responsible for setting Government-wide information policies and for providing oversight for the agencies' information management activities. Such oversight would include periodic evaluations of the agencies' information management activities. The activities covered by the bill include reports clearance and paperwork control, statistics, privacy, automatic data processing (ADP), telecommunications, and records management.

These last three items--ADP, telecommunications, and records management--have been added to the information management functions initially assigned to the OMB office by S. 1411. The addition of these functions will provide for an integrated approach to Federal information management to insure that consistent policies are established and that central management is strengthened. ADP and telecommunications, in particular, provide the tools by which the Government can manage its information resources more effectively. Furthermore, these additions are consistent with the objectives of those areas contained in S. 1411 to reduce the reporting burden on the public and the Government's costs in acquiring, disseminating, using, storing, and disposing of information.

We strongly support the objectives of the proposed substitute bill. We believe it provides the basic central management structure--including the authority, responsibility, and accountability--for exerting badly needed control and

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oversight for these interrelated areas. Significantly, our analysis of the bill indicates that its provisions are generally consistent with many of the recommendations of the Commission on Federal Paperwork.

NEW MANAGEMENT STRUCTURE CREATED

A new management structure for the Government's information activities would be created by the bill. The proposed structure consists of two key elements, both of which we believe are essential. First, a central office is created within OMB, with broad responsibilities for developing consistent information policies and overseeing agency activities. Second, a high-level official is to be designated within each agency who will be held accountable for insuring that the agencies effectively carry out their information management activities.

We favor the creation of a statutory office in OMB headed by an appointee of the OMB Director as provided in the bill. Placing the office in OMB and providing this type of appointment would give the OMB Director line authority for exercising the office's functions to assure accountability to the President and the Congress.

We strongly support the creation of this structure which we believe should enhance the economy and efficiency of Government information activities and ultimately reduce the reporting, recordkeeping, and related regulatory burdens imposed on the public.

The proposed bill provides for linking together OMB's existing responsibilities for overseeing the regulatory process with the closely related information management functions described above. This relationship between the regulatory process and information management is reflected in OMB's existing Office of Regulatory and Information Policy.

We believe this combination of functions has worked well. The principal areas of growth in Federal paperwork burdens are associated with new regulations. Therefore, it seems appropriate to retain the existing link between the functions for controlling both regulatory and paperwork burdens. We would urge, however, that the new Office of Information and Regulatory Policy not be given added responsibilities which could divert it from its basic mission of improving Federal information management.

The bill authorizes specific funding to carry out the office's functions. We believe this is essential for the office to succeed. Historically, limited resources have been applied to the information management areas. Accordingly, we agree the Congress should provide specific resource allocations to OMB to support these activities.

SCOPE OF ACTIVITIES
ASSIGNED THE NEW OFFICE

Under the bill, Federal information-related activities include reports clearance and paperwork control, statistics, privacy, records management, automatic data processing, and telecommunications. We agree that the policy-setting and oversight responsibilities--but not the operating responsibilities--for these areas should be vested in the new OMB office. This should facilitate the establishment of consistent policies and standards covering Federal information management activities. A list of GAO reports calling for improved management and oversight in the areas covered by the bill is in enclosure I.

At the present time, OMB has some degree of responsibility in the paperwork, privacy, ADP, and telecommunications areas. Under the bill, the extent of OMB's responsibility in these areas will be expanded or clarified. The areas of records management policy and statistical policy will be added.

With regard to records management, the bill recognizes the need to provide a cohesive Federal information policy and to coordinate the various components of Federal information practices. Records management, concerned with information use and disposition, is a vital element of information policy. In the past, this function has not received the level of management attention it deserves. For example, although the General Services Administration (GSA) is authorized to do so, it does not always report to OMB or to the Congress serious weaknesses in agencies' records management programs along with the potential for savings if corrective actions are taken. We pointed this problem out as early as 1973, but in a recent study we found that GSA's actions to date have been inadequate.

We believe the assignment of oversight responsibility in OMB and the periodic evaluations required by the bill would remedy this situation. In doing so, the benefits which improved records management practices can bring to the performance of Federal programs can be realized.

For the first time, records retention requirements imposed on the public and on State and local governments would come under review. The GSA presently reviews Federal agency records retention. However, no agency reviews records retention requirements imposed by Federal regulations on individuals, industry, or State and local governments. Therefore, these retention requirements often lack consistency or clarity. We favor coordinating retention requirements as recommended by the Commission on Federal Paperwork and as proposed in the bill.

We strongly support the provisions in the proposed substitute bill for consolidating, elevating, and clarifying OMB's policy function for the acquisition and management of automatic data processing and telecommunications resources. We are especially pleased that policy and oversight for ADP and telecommunications are included among the general functions of the Director.

The present situation in ADP is characterized by:

- the confusion of policy roles between OMB and GSA;
- overly complex and costly software that too often fails to meet user needs, is inefficient, or simply does not work; and
- a costly, prolonged, and ineffective acquisition process which too often emphasizes hardware characteristics over sound financial investment.

The bill reemphasizes the principles contained in the Brooks Act (Public Law 89-306) for strong oversight and management of the acquisition and use of ADP resources. The functions assigned OMB, GSA, and the Department of Commerce under the Brooks Act are not changed. However, by reemphasizing the Brooks Act, the bill attempts to strengthen the leadership and central direction provided by these agencies. Further, the consolidation within OMB of policymaking and oversight responsibilities for the other information management functions covered by the bill should enhance the capability for applying advanced information technology to the problems of controlling paperwork burdens and improving the quality of data for program management and evaluation.

With regard to telecommunications policy, we have long been concerned with the lack of a focal point and the fragmented organizational arrangement for managing the Government's own communications. In a 1969 report, we recommended that the

President consider a realignment which would establish an organization and give it stature, authority, and resources sufficient to serve as the Government's central focal point in telecommunications matters. As a result of our report and other studies, the Office of Telecommunications Policy was established. Unfortunately, this Office was not given the authority and resources we considered necessary to be effective.

Executive Order 12046 dispersed the Office's limited functions and authority to six separate organizations eliminating the focal point. Furthermore, the specific authority and responsibilities assigned by the Executive Order to the six organizations, and the boundaries between them, are not clear. As we understand the intent of the proposed bill, it would establish OMB as the policy setting focal agency for Federal Government telecommunications.

We are concerned, however, that the proposed section 3518(b) may unnecessarily confuse OMB's Federal telecommunications responsibilities as described in section 3504(g). Section 3518(b) appears to reserve for the Secretary of Commerce responsibility for (1) establishing policies concerning spectrum assignments to United States owned and operated radio stations and (2) coordinating telecommunications activities of the executive branch. These functions, along with responsibility for advising OMB on policies for procurement and management of Federal telecommunications systems, were transferred to the Secretary by Reorganization Plan No. 1 of 1977, as amended. We believe that leaving the three functions with the Secretary of Commerce, instead of clearly transferring responsibility for them to OMB, would fragment and weaken OMB's role in establishing Federal telecommunications policy. The proposed provision would not truly focus accountability for all Federal telecommunications policy in OMB. We suggest that section 3518(b) be modified as shown in enclosure II.

This suggested modification will also take care of an additional concern with section 3518(b). We believe the references to "information policy" and "information systems" are unnecessarily broad and could be construed to refer to statistical policy responsibilities vested in OMB by this bill and ADP acquisition responsibilities assigned OMB and GSA under the Brooks Act. Furthermore, we note that Executive Order 12046, assigning the telecommunications functions to

the Department of Commerce, does not use these terms in describing Commerce's functions. We therefore suggest that the references to "information" be deleted in both cases. This would make section 3518(b) consistent with other parts of this bill and the telecommunications executive order.

In another telecommunications matter, we believe the references in section 3504(g)(2) and section 3(b) to section 110 of the Federal Property and Administrative Services Act of 1949 (40 U.S.C. 757) may be inappropriate. Section 110 establishes a Federal telecommunications fund used by GSA to finance telecommunications services and equipment or other expenses for operating a Federal telecommunications system. Since section 110 does not contain any provisions concerning the establishment of policy or guidance, we believe the reference to it should be eliminated.

An additional reason for deleting this reference in section 3504(g)(2) is that only a fraction of the Government's telecommunications are financed by the fund. Therefore, reference to it could imply a limitation on the Director's monitoring authority. Alternatively, if the intent is to provide monitoring over all Federal telecommunications under section 3504(g)(2), substitute language should be used, such as that suggested in enclosure II.

We have issued many reports on management problems and Government-wide issues in the rapidly growing ADP and telecommunications areas calling on OMB to develop, strengthen, improve, or clarify its policy and guidance. For example, in just 10 of 57 reports issued in the last decade on software and system problems, we found waste of almost \$300 million and years of delay on individual systems. We attribute much of this waste and delay to the lack of OMB guidance or management control for computer system development. We have also reported on the special and complex problems of privacy in ADP and communications systems.

OMB has lacked both sufficient staff and the organizational structure to address many of our recommendations and concerns. The bill's provisions for an administrator at a sufficient level of authority and separate fund authorization address these problems. The bill's ADP and telecommunications provisions would accomplish several of the key recommendations of the President's Reorganization Project for Federal ADP Activities and are also generally consistent with several Paperwork Commission recommendations.

PAPERWORK AND STATISTICAL POLICY

The bill would bring about significant changes in the controls over collecting information from the public, which include:

- ending the currently fragmented reports clearance responsibility and combining it with the statistical policy function in a single organization; and
- strengthening and clarifying the Federal Reports Act.

Consolidating fragmented activities

Progress toward achieving the Federal Reports Act's paperwork control objectives is hampered because there is no central management authority. Instead, control responsibility is fragmented among three organizations--OMB, GAO, and the Department of Education--and a substantial portion of the burden imposed on the public is outside the central control process. We strongly favor consolidating the fragmented responsibilities into the new OMB office and eliminating the exemptions to the Federal Reports Act clearance process.

Until 1973, the responsibility for paperwork control was in OMB. Then GAO was assigned responsibility for reviewing and clearing the independent regulatory agencies' reports. Subsequently, the Department of Health, Education and Welfare (HEW) 1/ was assigned responsibility over all Federal data collections from educational institutions and programs. This last responsibility was recently transferred to the Department of Education.

S. 1411, as initially introduced, would consolidate the reports approval authority in OMB, eliminating the exemptions to the central clearance process. However, the companion legislation passed by the House of Representatives (H.R. 6410), retains the exemption vested in the Secretary of Education. The Secretary of Education would retain the final approval authority over education information collections through September 30, 1982.

1/Now Department of Health and Human Services.

The Subcommittee's substitute bill achieves a compromise, retaining the coordinating mechanism of educational information collections in the Department of Education, but vesting final reports clearance authority in the OMB Director. We concur in this compromise, recognizing that the education coordination unit could be delegated OMB's clearance authority, provided the unit demonstrates sufficient capability.

In 1977, the President shifted the responsibility for setting statistical policies and standards and coordinating Federal statistical activities from OMB to the Department of Commerce. These responsibilities are closely related to the Federal Reports Act objectives for controlling paperwork burdens. For example, the application of statistical procedures to information collection may be helpful in improving the quality of the information collected and in reducing the reporting burden imposed on the public.

Because of this close relationship, the necessary coordination between the two functions is enhanced if the functions reside in a single organization. There is also a need to balance the sometimes conflicting interests for paperwork reduction on one hand, and those for improved statistics on the other, which can best be performed if both functions are in one organization. We therefore strongly favor transferring this function from the Department of Commerce to OMB.

In addition, agencies responsible for about 75 percent of the paperwork burdens are exempt from the Federal Reports Act. These include the Internal Revenue Service (IRS), other Treasury Department agencies, and supervisory functions of the bank regulatory agencies. The Commission on Federal Paperwork recommended, and we agree, that these exemptions be eliminated. The obvious reason is that controls are weakened by the exemptions.

Preserving regulatory agencies' independence

As discussed in our October 1979 letter, a key issue raised as a result of centralizing the clearance responsibility is how to preserve the independence of the independent regulatory agencies. For those agencies defined either in this bill or in their enabling legislation as independent regulatory agencies, section 3507 includes an important "override" provision. This section provides that OMB review proposed information requests. Any disapproval of a request

proposed by an independent regulatory agency may be overturned if the agency's members vote, by a majority, to override OMB's decision.

As we understand it, as presently drafted, section 3507 would enable an independent regulatory agency to overturn an OMB determination that an information collection request is unnecessary, without regard to the section of the bill relied on by OMB. For example, should the Director, OMB, make a determination under section 3509, having the effect of precluding an independent regulatory agency from collecting certain information, our understanding is that the independent regulatory agency could overturn the Director's decision.

We endorse this provision, and believe it provides more than ample protection for the independent regulatory agencies. Although GAO's authority under the present Federal Reports Act does not extend to the issue of the regulatory agencies' need for information, our experience indicates that those agencies should have no difficulty in justifying their legitimate information requirements. The provision that the independent regulatory agencies certify their use of the override to OMB provides added protection, both for the agencies and the public, as it enables Congress to monitor these actions.

Changes to the Federal Reports Act

The changes in the organizational arrangements are only part of the problem needing resolution. We believe that major revisions are needed to clarify and strengthen the Federal Reports Act.

Section 2(a) of the bill replaces the Federal Reports Act, incorporating five needed changes. Our October 1979 comments provide a more detailed discussion of these changes. First, recordkeeping requirements are specifically included in the reports clearance process. Second, the act's definition of "information" is clarified to eliminate an ambiguity. Third, the bill clarifies agency responsibilities by requiring agencies to take specific actions before they request approval of their forms. Fourth, OMB is required to evaluate the agencies' information management controls. Fifth, the bill authorizes OMB to delegate its clearance authority to the agencies in cases where the agencies have demonstrated sufficient capability. This would enable OMB to shift its emphasis to a policy setting and management oversight role in contrast to the time-consuming effort of clearing individual reporting and recordkeeping requirements.

Emergency clearance procedure

We endorse the concept of an emergency clearance procedure and have cleared proposed reporting requirements for the independent regulatory agencies when emergency conditions have existed. However, we are concerned about the specific provision for emergency clearance of proposed reporting requirements contained in the bill and suggest some modification as shown in enclosure II.

The provision establishes very broad criteria to serve as a basis for agency requests for emergency clearances, with little time (1 workday) being allowed OMB to take any sort of review action. These criteria are an agency head's determination that the proposed reporting requirement (1) is needed before 60 days, and (2) is essential to the agency's mission. We believe such criteria provide too weak a test as to whether emergency circumstances actually exist. All proposed information collections should meet the criteria of being essential to an agency's mission. It may also be necessary for an agency to collect information before the conclusion of a 60-day period, but we question the need for a 1-day response in each proposed emergency case. Requiring a decision by the OMB Director in 1 workday essentially precludes any investigation and analysis of the proposed reporting requirement.

To strengthen the provision, we suggest adding criteria that a proposed information collection be necessary to preclude public harm or to respond to an unforeseen event. The addition of statutory criteria would provide the necessary guidance to limit agency proposals for emergency clearances to true emergencies.

We also suggest changing the 1 workday limit for a decision by the OMB Director to a minimum 2 workday period. One workday effectively precludes any opportunity on the part of the central clearance agency for raising questions about the proposed reporting requirement with either agency staff or proposed respondents. By allowing a 2-day period, the central clearance agency would have some chance to at least make limited inquiries about the requirement. In our own clearance procedure, such inquiries have enabled us to rectify problems noted during the discussions or during our brief review of the requirement. We were also able to meet the agencies' needs for quick approval of proposed reporting requirements. We recognize, however, that in cases where advance discussions with proposed respondents would jeopardize

the information collection, such discussions would not be held. Still, a second day would permit an opportunity to at least make a limited review of the requirement and correct identified problems.

Burden reduction goal

The Subcommittee's proposed substitute bill requires that the OMB Director set, upon enactment, a goal to reduce the public reporting burden by 15 percent by October 1, 1982. The Director is to also set a reduction goal of not less than 10 percent for fiscal year 1983.

Burden reduction goals can be useful provided the extent of the reporting burden is reasonably known and the goals remain flexible to account for changing conditions. However, the true extent of the reporting and recordkeeping burden imposed on the public is not known due to exemptions, information collections in violation of the Federal Reports Act, and technical problems in estimating burden.

We believe a more useful approach would be to add a requirement that OMB establish, within 1 year, a reasonably accurate total reporting and recordkeeping burden figure. This baseline figure could then be used to establish reduction goals for subsequent years. It would be necessary for the goals to remain flexible because new legislation can result in increased public reporting burden.

Followup on Paperwork
Commission recommendations

Further improvements in carrying out Federal information activities should be brought about as the agencies implement the Paperwork Commission's recommendations.

We are pleased that the bill extends for an additional 2 years OMB's statutory authority to oversee action on the recommendations of the Commission. We recommended such an extension in our recent report on the Commission recommendations (GGD-80-36; March 14, 1980). OMB's September 1979 report states that almost half of the recommendations, including many requiring legislation, are still open. We believe the additional time is necessary to complete the job.

Federal Information Locator System

We endorse the creation of a Federal Information Locator System, which would provide a source for locating information

maintained by different Federal agencies and which would help identify and eliminate unnecessary duplicate collections of information from the public. We recommended developing such a system in a 1975 report to the Senate Committee on Government Operations (GGD-75-85; July 24, 1975).

OMB has begun work on a locator system and some progress has been made. Much remains to be done, however. In this regard, we suggest that the milestone date for establishing the locator system be changed to 2 years after enactment of the bill, instead of the existing 1-year milestone. We are concerned that 1 year may not be long enough to solve the problems which inevitably arise in developing a complex information system. We have reported over the past several years on numerous failures of information systems development efforts due to inadequate planning. The complexity of the locator system development, the large number of agencies involved, and the system's projected costs mandate that each step of development be carefully planned.

The development of the proposed locator system should be closely coordinated with GAO's efforts to maintain its inventory of Federal information resources. This inventory was established under Title VIII of the Congressional Budget Act of 1974 (P.L. 93-344). The proposed system addresses, as we do, the identification, location, and nature of agencies' information sources and their potential use in the congressional decisionmaking process.

Coordination between the proposed OMB office and GAO will insure that overlap and duplication of efforts are minimized. As developmental efforts of the locator system proceed, OMB may wish to incorporate some of the features of our data files. And, if the locator system can successfully meet its public use requirements and the Congress' information needs, we may wish to consider consolidating some of our data collection and related activities.

OMB has reorganized its information and regulatory oversight activities, bringing together most of its existing functions related to the bill. This is a positive step. We do not, however, believe it negates in any way, the need for this legislation. Without the legislation, fragmented policy and oversight responsibilities will continue and badly needed changes in Federal information management controls will not be effected. The bill would greatly strengthen the hand of OMB in exercising its broad responsibilities for improving the management of the Federal Government.

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In conclusion, we see enactment of the proposed substitute bill for S. 1411 as an important landmark in a concerted effort to establish consistent Federal information policies. The management structure and tools put into place by this legislation will assist us in working toward solutions for the many information problems now existing. We believe the bill offers great potential for controlling paperwork burdens and improving program management through more efficient and effective use of information resources. We should not, however, deceive ourselves or others that this legislation represents more than the beginning of a long and difficult task.

We believe this proposed legislation is extremely important and hope that it will receive early consideration. We will be happy to assist in any way we can.

Sincerely yours,

Signed Elmer B. Staats

Comptroller General
of the United States

Enclosures - 2

*10/21/80
A.P. [unclear] 7.21.80
W.G. Anderson, 7/22/80*

GAO REPORTS ON INFORMATION MANAGEMENT

<u>Title</u>	<u>Recipient</u>	<u>Report Number and Date</u>
Program to Follow Up Federal Paperwork Commission Recommendations Is In Trouble	The Congress	GGD-80-36 March 14, 1980
Department of Agriculture: Actions Needed To Enhance Paperwork Management and Reduce Burden	Joint Economic Committee	GGD-80-14 March 10, 1980
Letter Report On Assessment Of The Paperwork Burden On S. 2160	Senate Subcommittee on Federal Spending Practices and Open Government Committee on Governmental Affairs	B-129874 Feb. 11, 1980
Letter Report On Assessment Of The Paperwork Burden On S. 1782	Senator David Pryor	B-129874 Feb. 11, 1980
Protecting The Public From Unnecessary Federal Paperwork: Does The Control Process Work?	The Congress	GGD-79-70 Sept. 24, 1979
Federal Paperwork: Its Impact On American Businesses	Joint Economic Committee	GGD-79-4 Nov. 17, 1978
Further Simplification of Income Tax Forms and Instructions Is Needed and Possible	Joint Committee on Taxation	GGD-78-74 July 5, 1978
Better Management Needed In Exchanging Federal And State Tax Information	Joint Committee on Taxation	GGD-78-23 May 22, 1978
Letter Report On OMB's Federal Reports Act Responsibilities And The President's Reporting Reduction Program	Senate Subcommittee on General Services Committee on Governmental Affairs	GGD-77-38 May 25, 1977

GAO REPORTS ON INFORMATION MANAGEMENT (Continued)

<u>Title</u>	<u>Recipient</u>	<u>Report Number and Date</u>
Status of GAO's Responsibilities Under The Federal Reports Act	The Congress	OSP-76-14 May 28, 1976
Case Study Of Department Of Labor And Office of Management And Budget Activities Under The Federal Reports Act	Senate Committee On Government Operations	GGD-75-85 July 24, 1975
Problems In Test Censuses Cause Concern For 1980 Census	Chairman, Subcom- mittee on Census and Population, House Committee on Post Office and Civil Service	GGD-80-62 June 3, 1980
Letter Report On Federal and State Officials' Views On The Operations Of Five Federal/State Cooperative Statistical Programs	Director, Office of Federal Statis- tical Policy and Standards Department of Commerce	GGD-80-71 June 2, 1980
Problems In Developing The 1980 Census Mail List	Chairman, Subcom- mittee on Census and Population, House Committee on Post Office and Civil Service	GGD-80-50 March 31, 1980
Reliable Local Unemploy- ment Estimates: A Challenge For Federal and State Cooperation	The Congress	GGD-79-79 July 27, 1979
After Six Years, Legal Obstacles Continue To Restrict Government Use Of The Standard Statistical Establishment List	The Congress	GGD-79-17 May 25, 1979

GAO REPORTS ON INFORMATION MANAGEMENT (Continued)

<u>Title</u>	<u>Recipient</u>	<u>Report Number and Date</u>
Better Guidance And Controls Are Needed To Improve Federal Surveys Of Attitudes and Opinions	House Subcommittee on Energy and Power Committee on Inter- state and Foreign Commerce House Subcommittee on Oversight and Investigations Committee on Inter- state and Foreign Commerce	GGD-78-24 Sept. 15, 1978
The Statistical Reporting Service's Crop Reports Could Be Of More Use To Farmers	Senator George McGovern	GGD-78-29 April 13, 1978
An Assessment of Capacity Utilization Statistics-- Strengths And Weaknesses	Representative John Y. McCollister	CED-77-3 Oct. 28, 1976
Adjusted Taxes: An Incom- plete And Inaccurate Measure For Revenue Sharing Allocations	The Congress	GGD-76-12 Oct. 28, 1975
Conversion: A Costly, Disruptive Process That Must Be Considered When Buying Computers	Chairman, House Committee on Appropriations	FGMSD-80-35 June 3, 1980
Wider Use Of Better Computer Software Technology Can Improve Management Control And Reduce Costs	The Congress	FGMSD-80-38 April 29, 1980
DOD Automated Materials Handling Systems--Need To Standardize And Follow GSA ADPE Approval Process	Secretary of Defense	LCD-80-49 April 24, 1980

GAO REPORTS ON INFORMATION MANAGEMENT (Continued)

<u>Title</u>	<u>Recipient</u>	<u>Report Number and Date</u>
Stronger Management of EPA's Information Resources Is Critical To Meeting Program Needs	The Congress	CED-80-18 March 10, 1980
Farmers Home Administration's ADP Development Project--Current Status And Unresolved Problems	Chairman, House Committee on Appropriations	CED-80-67 Feb. 19, 1980
Letter Report On Review Of Selected Computer System Procurements	Chairman, House Committee on Appropriations	FGMSD-80-34 Feb. 15, 1980
Letter Report On Air Force Sole Source Computer Acquisitions Not Warranted	House Committee on Government Operations	FGMSD-80-30 Jan. 24, 1980
Letter Report On The Federal Highway Administration Will Redesign Its Accounts System To Eliminate Inefficient Uses of Computers and People	The Secretary of Transportation	FGMSD-80-22 Jan. 11, 1980
Contracting For Computer Software Development--Serious Problems Require Management Attention to Avoid Wasting Additional Millions	The Congress	FGMSD-80-4 Nov. 9, 1979
The Air Force Should Cancel Plans To Acquire Two Computer Systems At Most Bases	House Committee on Government Operations	FGMSD-80-15 Oct. 26, 1979
Improvements Needed In The Tennessee Valley Authority's Management And Use Of Its Automatic Data Processing Resources	Chairman, Board of Directors, Tennessee Valley Authority	EMD-79-102 Sept. 6, 1979

GAO REPORTS ON INFORMATION MANAGEMENT (Continued)

<u>Title</u>	<u>Recipient</u>	<u>Report Number and Date</u>
Letter Report On Problems Associated With Developing Large, Complex Data Processing Systems	House Committee on Government Operations	FGMSD-79-49 Aug. 16, 1979
Flaws In Controls Over The Supplemental Security Income Computerized System Cause Millions In Erroneous Payments	The Secretary of Health, Education and Welfare	HRD-79-104 Aug. 9, 1979
Better Information Management Policies Needed: A Study Of Scientific And Technical Bibliographic Services	The Congress	PSAD-79-62 Aug. 6, 1979
Data Base Management Systems--Without Careful Planning There Can Be Problems	The Congress	FGMSD-79-35 June 29, 1979
Letter Report On Acquisition Of Automatic Data Processing Resources	Administrative Office of the U.S. Courts Federal Judicial Center	FGMSD-79-30 June 21, 1979
IRS Can Better Plan For and Control Its ADP Resources	Commissioner of Internal Revenue, Department of the Treasury	GGD-79-48 June 18, 1979
Automated Systems Security-- Federal Agencies Should Strengthen Safeguards Over Personal And Other Sensitive Data	The Congress	LCD-78-123 Jan. 23, 1979
The Labor Department Should Reconsider Its Approach To Employment Security Automation	The Congress	HRD-78-169 Dec. 28, 1978

GAO REPORTS ON INFORMATION MANAGEMENT (Continued)

<u>Title</u>	<u>Recipient</u>	<u>Report Number and Date</u>
Letter Report On Review Of The Automatic Data Processing Equipment (ADPE) Interim Upgrade Acquisition Process	Administrator of General Services	FGMSD-79-10 Dec. 28, 1978
Letter Report On Reviewing The Bureau Of The Census' Management And Use Of Automatic Data Processing (ADP) Resources	House Committee on Government Operations	FGMSD-79-5 Dec. 13, 1978
Managing Weapon System Software: Progress and Problems	The Congress	PSAD-78-112 July 10, 1978
The Federal Information Processing Standards Program: Many Potential Benefits, Little Progress, And Many Problems	The Congress	FGMSD-78-23 April 19, 1978
Farmers Home Administration Needs To Better Plan, Direct, Develop, and Control Its Computer-Based Unified Management Information System	Chairman, House Appropriations Subcommittee on Agriculture, Rural Development and Related Agencies	CED-78-68 Feb. 27, 1978
Accounting For Automatic Data Processing Costs Needs Improvement	The Congress	FGMSD-78-14 Feb. 7, 1978
Computer Auditing In The Executive Departments: Not Enough Is Being Done	The Congress	FGMSD-77-82 Sept. 28, 1977
Millions In Savings Possible In Converting Programs From One Computer To Another	The Congress	FGMSD-77-34 Sept. 15, 1977
Problems Found With Government Acquisition And Use Of Computers From November 1965 To December 1976	The Congress	FGMSD-77-14 March 15, 1977

GAO REPORTS ON INFORMATION MANAGEMENT (Continued)

<u>Title</u>	<u>Recipient</u>	<u>Report Number and Date</u>
Managers Need To Provide Better Protection For Federal Automatic Data Processing Facilities	The Congress	FGMSD-76-40 May 10, 1976
Improvements Needed In Managing Automated Decision-making By Computers Throughout The Federal Government	The Congress	FGMSD-76-5 April 23, 1976
Opportunity For Savings Of Large Sums In Acquiring Computer Systems Under Federal Grant Programs	The Congress	FGMSD-75-34 July 24, 1975
Program To Improve Federal Records Management Practices Should Be Funded By Direct Appropriations	The Congress	LCD-80-68 June 23, 1980
Letter Report On Study Of Presidential Libraries	House Subcommittee on Government Information and Individual Rights Committee on Govern- ment Operations	LCD-80-27 Dec. 5, 1979
Improvements Are Needed In The Management Of The National Archives Preservation and Trust Fund Activities	Administrator of General Services	LCD-80-13 Oct. 26, 1979
Valuable Government-Owned Motion Picture Films Are Rapidly Deteriorating	The Congress	LCD-78-113 June 19, 1978
Challenges Of Protecting Personal Information In An Expanding Federal Computer Network Environment	The Congress	LCD-76-102 April 28, 1978

GAO REPORTS ON INFORMATION MANAGEMENT (Continued)

<u>Title</u>	<u>Recipient</u>	<u>Report Number and Date</u>
Ways To Improve Records Management Practices In The Federal Government	The Congress	B-145743 Aug. 13, 1973
An Informed Public Assures That Federal Agencies Will Better Comply With Freedom Of Information/Privacy Laws	Senate Committee on the Judiciary	LCD-80-8 Oct. 24, 1979
Privacy Act of 1974 Has Little Impact On Federal Contractors	House Subcommittee on Government Information and Individual Rights Committee on Government Operations	LCD-78-124 Nov. 27, 1978
Impact Of The Freedom Of Information And Privacy Acts On Law Enforcement Agencies	Senate Committee on the Judiciary	GGD-78-108 Nov. 15, 1978
Government Field Offices Should Better Implement The Freedom Of Information Act	House Subcommittee on Government Information and Individual Rights Committee on Government Operations	LCD-78-120 July 25, 1978
Data On Privacy Act And Freedom Of Information Act Provided By Federal Law Enforcement Agencies	Senate Committee on the Judiciary	LCD-78-119 June 16, 1978
Agencies' Implementation Of And Compliance With The Privacy Act Can Be Improved	Office of Management and Budget	LCD-78-115 June 6, 1978
Timeliness And Completeness Of FBI Responses To Requests Under Freedom Of Information And Privacy Acts Have Improved	The Congress	GGD-78-51 April 10, 1978

GAO REPORTS ON INFORMATION MANAGEMENT (Continued)

<u>Title</u>	<u>Recipient</u>	<u>Report Number and Date</u>
FBI Taking Actions To Comply Fully With The Privacy Act	House Subcommittee on Government Information and Individual Rights Committee on Government Operations	GGD-77-93 Dec. 26, 1977
Reduced Communications Costs Through Centralized Management of Multiplex Systems	The Congress	LCD-80-53 May 14, 1980
Economic and Operational Benefits In Local Telephone Service Can Be Achieved Through Government-Wide Coordination	The Congress	LCD-80-9 Nov. 14, 1979
Navigation--A New Direction is Needed	The Congress	LCD-77-109 March 3, 1978
Secure Voice Telephone Systems--How Department of Defense Can Save Millions	The Congress	LCD-77-105 Dec. 30, 1977
Need To Control Federal Warning System Proliferation	The Congress	B-133202 April 9, 1976
Economies Available Through Consolidation or Collection Of Government Land Based High Frequency Communications Facilities	The Congress	B-169857 Feb. 6, 1976

PROPOSED BILL CHANGESProposed revision to Section 3504(g)(2):

(2)(A) Monitoring the effectiveness of, and compliance with, directives issued pursuant to section 111 of the Federal Property and Administrative Services Act of 1949 (40 U.S.C. 759) and reviewing proposed determinations under section 111(g) of such Act.

(B) Monitoring the effectiveness of, and compliance with, directives for Federal telecommunications.

Proposed revision to Section 3507(g):

(g) (1) If an agency head determines an information collection (1) is needed before 60 days, (2) is essential to the agency's mission, and (3) the agency cannot reasonably comply with the provisions of this section, the agency head may request the Director to provide emergency clearance of such information collection. The Director shall either approve or disapprove such emergency requests within 2 work-days. Any information collection conducted pursuant to this provision may be conducted without compliance with the provisions of this chapter for a maximum of 90 days.

(2) In determining whether to approve or disapprove emergency requests, the Director shall require that the agency head show that either of two conditions exist:

- (A) public harm will result if normal clearance procedures are followed, or
- (B) an unanticipated event has occurred and the use of normal clearance procedures will prevent or disrupt the collection of information related to the event or will cause a statutory deadline to be missed.

(3) In the event of disapproval of a request for emergency clearance, the Director shall immediately proceed with review of the collection as provided in subparagraph (c).

Proposed revision to Section 3518(b):

(b)(1) The Department of Commerce, pursuant to law and Executive Order, retains its responsibility for conducting telecommunications research and development and its other

telecommunications functions, except for those that pertain to the Federal sector as assigned to the Director, Office of Management and Budget under this Act.

(2) The Department of State, pursuant to law and Executive Order, shall continue to exercise primary authority for the conduct of foreign policy with respect to telecommunications in coordination with other agencies as appropriate.