

Frequently Asked Questions about ROCIS's New Common Forms Module

1. What is a common form?

With the rollout of ROCIS's New Common Forms Module, OIRA is introducing a new term: the "common form." A "common form" is an information collection that can be used by two or more agencies, or government-wide, for the same purpose. The new Common Forms Module allows a "host" agency to obtain Office of Management and Budget approval of an information collection for use by one or more "using" agencies. After OMB grants approval, any prospective using agency that seeks to collect identical information for the same purpose can obtain approval to use the "common form" by providing its agency-specific information to OMB (e.g., burden estimates and number of respondents).

2. Is there a difference between a standard form and a common form?

Yes. A "standard form," as currently defined, is a type of common form but its use by all agencies is required. For example, the Office of Personnel Management requires that the Standard Form (SF)-86, "Questionnaire for National Security Positions," be used for all agencies who are hiring personnel for national security positions. A standard form is thus a common form, but not necessarily vice versa. The Common Forms Module encompasses both standard and other common forms. Going forward, OIRA will refer to all forms for this new module—including standard forms—as "common forms."

3. Why is this new module or process necessary?

We created the Common Forms Module to encourage agencies to seek common data solutions, increase efficiency, and better account for the burden imposed on the public by Federal agencies. Prior to the implementation of the Common Forms Module, a host agency was unable to disaggregate the reporting burden imposed through its use of a common form from the burden imposed by other agencies' use of the common form. For example, Grants.gov owned the SF-424 series (grant-related application common forms), which meant that the Department of Health and Human Services (the host agency for Grants.gov) was required to include in its burden inventory the entire burden imposed by all grant-making agencies that used the SF-424 forms. Although this process was simple for the using agencies, it posed several problems. First, a host agency became responsible for burden that was not within its control. This discouraged agencies from adopting common formats for information collections and created inefficiencies and redundancies in both the approval process and the information collections. Second, the process for estimating use of the forms and calculating burden was not always consistent across agencies. This led to potential underreporting of burden and weak accountability regarding the approved use of these forms.

4. What process do agencies follow to obtain OMB approval to convert existing common forms or create new common forms using the new module?

A host agency will follow the procedural requirements of the Paperwork Reduction Act (PRA) and OMB's PRA regulations (See 5 CFR Part 1320). These requirements include publishing notices in the *Federal Register* for public comment and submitting information collection requests (ICRs) to OMB to obtain approval of a common form. The host agency will indicate in the *Federal Register* notices that it is requesting approval of a common form and, if known, identify other agencies that may use the information collection. Both the *Federal Register* notices and the ICR should account only for the burden imposed by the host agency's use of the common form. Once the host agency has received approval from OMB, any agency will be able to request OMB approval for its use of the common form in ROCIS by providing its agency-specific information to OMB (e.g., burden estimates and number of respondents). Additional public notice by those agencies will not be required.

5. What are the responsibilities of the host agencies to inform using agencies that they are converting forms, using the new module?

In order to facilitate this new process, after consulting with OIRA, host agencies will notify other agencies that a common form has been converted. In addition, we will be sending emails through the Chief Information Officer Council to inform agencies of the new Common Forms Module requirements and provide banner notification alerts via ROCIS to remind agencies that this new module exists.

6. When should agencies start using this module?

The Common Forms Module is operational and an agency may request approval now. We encourage agencies, as appropriate, to use the Common Forms Module to convert existing forms into "common forms" as soon as possible. Existing forms that have already been PRA-approved, however, will not be required to be converted to "common forms" through this new module before their current three-year approval expires.

7. Does a prospective host agency need to know whether a common form will be used by other agencies before it requests OMB's approval of the common form?

No. However, agencies should consider whether the information they plan to collect might be information that other agencies might also collect, or whether other agencies have used their forms in the past. We encourage agencies to consult with each other to identify common sets of information to be collected and coordinate their requests for OMB approval. We also encourage agencies that use other agencies' forms to contact those agencies and suggest that a common form approach be used.

8. Can the Common Forms Module approach be used for common forms hosted and used by components within the same agency?

If an agency has OMB Control Numbers with distinct four-digit prefixes for individual components within the agency, it will be possible to use this approach. The host agency could be any of the components and the “users” would be any other sub-agency component with a distinct four-digit prefix. For example, USDA might request approval using this approach under a departmental office (control number OMB 0505-xxxx). As explained above, the “host” would only request approval for the burden imposed by their collection. Once approved, any other component within USDA with an OMB Control Number prefix (e.g., APHIS 0579, GIPSA 0580), could obtain approval from OMB by providing component-specific information. Additional public notice would not be required.

9. If a host agency includes a number of forms in their request, is it possible for a using agency to request approval for only one of the forms?

Yes. If the host agency has identified the forms as separate Information Collections (IC) within its request, a using agency will be able to request approval of its use of a specific IC.

10. Can a using agency obtain approval if the information will be collected with a different instrument (e.g., the host agency requests approval for a web application, but the using agency develops a different web application)?

Yes, but only if the host agency included the different instruments as separate ICs as part of their common form approval. A using agency can then request approval for the specific IC instrument applicable for them. Therefore it would not be permitted for a using agency to collect information via paper format if the host agency only requested to collect the information electronically since the burden of those instruments will vary.

11. To what extent may a using agency change the information collected with a host agency’s approved common form?

The only changes that a using agency can make to an approved common form are those that are necessary to identify the using agency on the instrument itself and in the instructions. For example, to use the Department of Veterans Affairs (VA) Form 4939, a using agency would need to replace references to the host agency (in this case, VA) with references to the using agency throughout the form. In addition, the using agency is allowed to make necessary text modifications in the instructions, so respondents know to send information back to their specific agency.

12. To what extent may a using agency change the purpose for which a host agency’s approved common form is used?

If the using agency’s purpose for the information collection is different from the purpose identified by the host agency, the using agency cannot use the common form. To use a common form for a different purpose, the using agency would be required, pursuant to the PRA and OMB’s PRA regulations, to allow for public notice and comment and obtain OMB approval.

OMB's review would consider the using agency's proposed use of the information within the context of the agency's stated purpose.