

## ***ADVOCACY SUBMITS COMMENTS ON THE PAPERWORK REDUCTION ACT***

On December 23, 2009, the Office of Advocacy of the U.S. Small Business Administration (Advocacy) submitted a comment letter in response to the Office of Management and Budget's request for comments on *Improving the Implementation of the Paperwork Reduction Act*. A copy of Advocacy's comments can be found at: [www.sba.gov/advo/laws/comments](http://www.sba.gov/advo/laws/comments). Advocacy asserted:

- One of the main purposes of the Paperwork Reduction Act (PRA) is to minimize the paperwork burden for small businesses. It is an important tool for assessing the amount of paperwork that may be generated by regulation and reducing the amount of paperwork that is required for businesses.
- An accurate calculation under the PRA enhances an agency's ability to provide the information that is required for assessing the projected reporting, record keeping, and other compliance requirements of a proposed rule as required under sections 603 and 604 of the Regulatory Flexibility Act (RFA).
- PRA would be substantially improved if the agency were required to (a) list the small entities that were consulted (b) provide a copy of the small entity alternatives discussed with these entities and (c) reported on the small entity input and the agency response to the input. One stop information collection techniques would also ease the burden on small entities.
- Agencies should also be required to periodically review all paperwork collection requests and justify the need for paperwork requirements that are outdated and/or obsolete. If the agency cannot provide that justification, the requirement should be rescinded. In addition, agencies should be required to submit their findings to the Office of Advocacy so that Advocacy can determine if an RFA section 610 review is warranted.

For more information, visit Advocacy's webpage at [www.sba.gov/advo](http://www.sba.gov/advo) or contact Jennifer Smith at 202-205-6943.