

February 2002

INFORMATION
RESOURCES
MANAGEMENT

Comprehensive
Strategic Plan Needed
to Address Mounting
Challenges



G A O

Accountability * Integrity * Reliability

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Abbreviations

AIMD	Accounting and Information Management Division
CDC	Centers for Disease Control and Prevention
CIO	Chief Information Officer
FTE	full-time-equivalent
GAO	General Accounting Office
GGD	General Government Division
IRM	information resources management
IT	information technology
NARA	National Archives and Records Administration
NTIS	National Technical Information Service
OCG	Office of the Comptroller General
OIRA	Office of Information and Regulatory Affairs
OMB	Office of Management and Budget
PRA	Paperwork Reduction Act



United States General Accounting Office
Washington, DC 20548

February 22, 2002

The Honorable Joseph I. Lieberman
Chairman, Committee on Governmental Affairs
United States Senate

Dear Mr. Chairman:

The events of September 11 and the subsequent anthrax attacks have demonstrated the importance of accurate, timely information and the need for strong leadership in integrating and managing this information across government agencies. As agencies have struggled with issues involving intelligence gathering, information sharing and dissemination, security, and information technology (IT), it has become increasingly apparent that our government needs to better assess—from a strategic standpoint—all aspects of how it handles information.

In recognition of the importance of government information, the Congress in 1980, as you know, passed the Paperwork Reduction Act (PRA) to establish a single, overarching policy framework for the management of information resources. The act, amended in 1986 and 1995, established information resources management (IRM) as an approach governing virtually all aspects of government information activities, including collection, dissemination, security and privacy, and management of information technology. The act also created the Office of Information and Regulatory Affairs (OIRA) within the Office of Management and Budget (OMB), to provide leadership, policy direction, and oversight of governmentwide IRM. It further

- required OIRA to develop and maintain a governmentwide strategic IRM plan, and
- charged OIRA with responsibilities for general IRM policy and specific IRM functions: information collection, dissemination, statistical policy and coordination, records management, privacy and security, and information technology.

Since 1998, OIRA has designated the Chief Information Officers Council's strategic plan as the principal means of meeting the requirement for a governmentwide strategic IRM plan. The most recent plan is for fiscal years 2001–2002 and was published jointly by OMB and the CIO Council in October 2000. According to this plan, its goal is to enhance the strategic focus of the Council, establish roadmaps for achieving the strategic vision,

define measures to assist the Council in evaluating its progress toward meeting its challenges, and provide a basis for budget planning.

This report responds to your request that we review OIRA's actions to fulfill its responsibilities under PRA. Specifically, our objectives were to (1) assess the adequacy of the governmentwide strategic IRM plan developed in response to the act's requirements and (2) provide status information on OIRA's actions to address its IRM policymaking, oversight, and functional responsibilities under the act. Our review was conducted at OMB headquarters in Washington, D.C., from June through December 2001, in accordance with generally accepted government auditing standards. Appendix I contains details of our scope and methodology.

Results in Brief

While OIRA designated the Chief Information Officers Council's strategic plan for fiscal years 2001–2002 as the governmentwide strategic IRM plan required by the Paperwork Reduction Act, it does not constitute an effective and comprehensive strategic vision.

- The plan establishes a vision and a number of governmentwide goals that address significant issues such as e-government, information security, and development of information technology skills and resources. Each goal has a set of associated objectives and strategies. The goals, however, are not linked to expected improvements in agency and program performance. The goals also do not address IRM comprehensively; for example, statistical activities, records management, and the collection and control of paperwork are not addressed.
- In discussing our evaluation, OIRA asserted that while the Chief Information Officers Council's plan is the primary vehicle for complying with the planning requirements in PRA, other documents supplement the plan. These other documents include the *President's Management Agenda* issued in August 2001, budget documents for fiscal year 2002, and summaries of agency reports on paperwork elimination (October 2001) and computer security (February 2002). Of the documents cited, only the president's management agenda is strategic in providing a governmentwide goal and associated strategies for expanding e-government. The remaining documents deal with various aspects of the government's use of IRM but do not contain governmentwide goals, strategies, or performance measures, and thus do not address the weaknesses we identified. Further, this multitude of documents, issued at different points in time, has not historically been integrated or linked together to clearly communicate to internal and external stakeholders a unified strategic vision and accountability measures for government IRM.

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- These shortcomings call into question the degree of management attention that OIRA has traditionally devoted to producing the governmentwide strategic IRM plan. Without an effective unifying plan, federal agencies are left to address information needs in isolation, without a comprehensive vision to unify their efforts. Further, the risk is increased that current and emerging IRM challenges will not be met. We are making recommendations to the OIRA administrator on developing an effective and comprehensive plan.

Regarding the status of actions to respond to other key requirements in PRA, OIRA has issued policy and implementing guidance, conducted oversight activities, and taken a variety of actions regarding each of the functional areas. Based on our work over the last decade, however, OIRA still faces challenges including improving the collection, use, and dissemination of government information, assuring the protection of critical private and public information systems, and strengthening information technology management processes. We have made numerous recommendations in previous reports to address these challenges, many of which have not yet been implemented.

In commenting on a draft of this report, the director, OMB, expressed concern that it (1) narrowly focuses on the finding that a governmentwide strategic plan must be a single document and reiterated OMB's position that the documents cited during our review meet the requirements for a governmentwide strategic IRM plan, and (2) does not incorporate the importance of the associate director for IT and e-government in providing direction to agencies on many PRA-related areas. We disagree that our report narrowly focuses on the strategic plan's being a single document. Our principal finding was that the documents cited by OMB during our review did not, separately or collectively, meet the requirements for a governmentwide strategic IRM plan established by PRA.

Further, while we believe there is value in producing a single plan to clearly communicate the administration's vision for IRM, we do not believe that OMB must necessarily produce an entirely new document to accomplish this. OMB has options for building on past efforts—including the CIO Council strategic plan, the president's management agenda, and the president's budget for 2003—to craft a plan that contains a comprehensive strategic statement of goals and resources.

Regarding the president's budget for 2003, released on February 4, 2002, after we sent a draft of this report to OMB for comment, it contains many of the elements required in a strategic plan that were not present in

previous documents cited by OMB and appears to address, in part, the recommendations in this report. As a result, we believe this document, when viewed in conjunction with the president's management agenda, represents credible progress toward developing a governmentwide plan. We intend to follow up on this and other documents OMB has indicated are forthcoming to determine the extent to which our recommendations have been implemented.

In regard to the associate director, we acknowledge the role that OMB has given him to provide strategic direction to agencies and have modified our recommendations to recognize the importance of the administrator's working in conjunction with this official in articulating a comprehensive IRM vision and in developing a governmentwide plan that meets PRA requirements.

Background

The need for strong leadership and a governmentwide strategic view of information management has long been recognized as critical. Along with establishing a single policy framework for federal management of information resources and formalizing the institutionalization of IRM as the approach governing information activities, the Paperwork Reduction Act (PRA) in 1980 created OIRA to develop IRM policy and oversee its implementation, at the same time giving it oversight responsibilities in specific IRM functional areas. The OIRA administrator is also to serve as the principal adviser to the director of OMB on IRM policy. The Clinger-Cohen Act of 1996 amended PRA to also give OIRA, through the director, significant leadership responsibilities in supporting agencies' actions to improve their IT management practices.

In addition to these statutory responsibilities, OIRA is responsible for providing overall leadership of executive branch regulatory activities. OIRA also reviews significant new regulations issued by executive departments and agencies (other than independent regulatory agencies) before they are published in the *Federal Register*. In calendar year 2000, OIRA staff reviewed approximately 2,900 proposed and 4,500 final rules.

OIRA is organized into five branches: Information Policy and Technology Management, Statistical Policy, Commerce and Lands, Human Resources and Housing, and Natural Resources. Information Policy and Technology is responsible for information dissemination, records management, privacy and security, and IT. Statistical Policy, headed by the chief statistician, is responsible for the statistical policy and coordination

requirements contained in the act. Desk officers in Commerce and Lands, Human Resources and Housing, and Natural Resources are responsible for information collection and regulatory review and related issues for specific agencies in a matrixed fashion, in consultation with relevant OIRA branches as well as the budget side of OMB. As of December 31, 2001, OIRA had a total of 51 full-time equivalent (FTE) staff assigned to the five branches: Information Policy and Technology Management (12 FTEs), Statistical Policy (6), Commerce and Lands (8), Human Resources and Housing (9), and Natural Resources (9). The OIRA Records Management Center accounted for one additional position; the Office of the OIRA Administrator accounted for the remaining six positions. OIRA has been allotted and is in the process of filling 5 additional slots.

Two other entities perform PRA-related activities. First, the Chief Information Officers (CIO) Council was established by executive order¹ in July 1996 as the principal interagency forum for improving agency IRM practices. For example, the Council is to make recommendations for overall IT management policy, procedures, and standards, and to provide advice to OMB on the development of the governmentwide strategic IRM plan required by PRA. The Council is composed of the CIOs and deputy CIOs from 28 federal agencies, plus senior officials from OMB. Second, last June OMB established the position of associate director for information technology and e-government. This individual is responsible for (1) working to further the administration's goal of using the Internet to create a citizen-centric government; (2) ensuring that the federal government takes maximum advantage of technology and best practices to improve quality, effectiveness, and efficiency; and (3) leading the development and implementation of federal IT policy. In addition, the associate director is responsible for (1) overseeing implementation of IT throughout the federal government, (2) working with the deputy director for management—also described by OMB as the federal CIO—to perform a variety of oversight functions statutorily assigned to OMB, and (3) directing the activities of the CIO Council.

We have previously reported on OIRA's efforts to respond to the PRA requirements for a governmentwide strategic plan.² In 1998, we reported that none of the various reports OIRA had designated since 1995 as being

¹ Executive Order 13011, *Federal Information Technology*, July 16, 1996.

² *Regulatory Management: Implementation of Selected OMB Responsibilities Under the Paperwork Reduction Act* (GAO/GGD-98-120, July 9, 1998).

the strategic IRM plan clearly discussed the objectives and means by which the federal government would use all types of information resources to improve agency and program performance—a key PRA requirement.

A Broad, Governmentwide Perspective: More Imperative Than Ever

Recent events have highlighted information as not only an asset but a critical tool, essential to achieving the fundamental purposes of government. In the aftermath of the attacks of the past few months, agencies have clearly struggled with issues concerning intelligence gathering, information sharing and dissemination, security, and critical information technology infrastructure. For example:

- Our September 2001 combating terrorism report³ highlighted that the growing threat of terrorism presented evolving challenges to the existing framework for leadership and coordination. We reported that the interagency and intergovernmental nature of programs to combat terrorism make it important that certain overall leadership and coordination functions be performed above the level of individual agencies. Accordingly, we recommended that the President appoint a single focal point with responsibility for overall leadership and coordination, including the development of a national strategy. The president subsequently appointed former governor Tom Ridge as the new director of homeland security, responsible for coordinating federal, state, and local actions and for leading and overseeing such a comprehensive approach to safeguarding the nation against terrorism. The successful formulation of such a comprehensive strategy will require development of one overall plan for the collection and analysis of information relating to terrorist activities or threats across the United States, and the securing of IT systems to facilitate the sharing of this information among the many entities involved.
- That same report also addressed the need to protect critical federal systems from computer-based attacks. As we reported, while an array of activities had been undertaken to implement a national strategy to mitigate risks to computer systems and the critical operations and infrastructures they support, progress in certain key areas had been slow. Specifically,

³ *Combating Terrorism: Selected Challenges and Related Recommendations* (GAO-01-822, September 20, 2001). See also *Homeland Security: A Framework for Addressing the Nation's Efforts* (GAO-01-1158T, September 21, 2001) and *Combating Terrorism: Comments on Counterterrorism Leadership and National Strategy* (GAO-01-556T, March 27, 2001).

agencies had taken steps to develop critical infrastructure protection plans, but independent audits continue to identify persistent, significant information security weaknesses that place federal operations at risk. Further, while outreach efforts by numerous federal entities to establish cooperative relationships with and among private and other nonfederal organizations had raised awareness and prompted information sharing, substantive analysis of sector-wide and cross-sector interdependencies and vulnerabilities had been limited. We recommended that the federal government's critical infrastructure protection strategy, which was under review at the time of our report, define (1) specific roles and responsibilities, (2) objectives, milestones, and an action plan, and (3) performance measures.

- The recent attacks have also highlighted the need for immigration, law enforcement, intelligence, and defense and foreign policy agencies to better share information on domestic and international terrorists and criminals. Concerns have been raised that the various databases and information systems containing this information may not be sufficiently linked to ensure that all levels of government have complete and accurate information.
- Recent events have also reemphasized the importance of ongoing efforts to improve the public health infrastructure that detects disease outbreaks, identifies sources and modes of transmission, and performs laboratory identification. According to the Centers for Disease Control and Prevention (CDC), the ability to share information on potential threats and remedial actions, and exchange data on newly identified disease outbreaks, is critical to our defense against bioterrorism. However, we, CDC, and others have identified deficiencies in the information systems and telecommunications capabilities at the local, state, and national levels that hinder effective bioterrorism identification and response. For example, in March 2001, CDC recommended that all health departments have continuous, high-speed access to the Internet and standards for data collection, transport, electronic reporting, and information exchange that protect privacy and seamlessly connect local, state, and federal data systems. In recent testimony, CDC emphasized that since September 11 it has accelerated its efforts to work with state and local health agencies, share critical lessons learned, and identify priority areas for immediate strengthening.⁴

⁴ Prepared statement by Edward L. Baker, M.D., M.P.H.; Director, Public Health Practice Program, Office Centers for Disease Control and Prevention, Department of Health and Human Services, before the Subcommittee on Technology and Procurement Policy, Senate Committee on Government Reform, December 14, 2001.

Beyond the recent terrorist acts, emerging trends also make clear the importance of information resources to government, and the need for a strategic approach. One such trend is the continuing shift from an industrial to a knowledge-based⁵ and global economy⁶ in which knowledge becomes the main driver of value and creation of wealth. One characteristic of a knowledge-based economy is a higher set of public expectations about government performance and accountability. In addition, the knowledge-based economy presents complex issues that require input from multiple institutions at different levels of government and within the private and nonprofit sectors. To address these challenges, government needs processes and structures that embrace long-term, cross-issue, strategic thinking. Understanding and developing these new processes will require active use and exchange of knowledge and information that are relevant, timely, accurate, valid, reliable, and accessible.

The administration has also recognized the need to improve government performance and, as a result, has established an ambitious agenda that is dependent on effective management of information resources. One of the governmentwide goals in *The President's Management Agenda for Fiscal Year 2002* is to expand e-government to provide high-quality service to citizens at reduced cost, make government services more accessible, and increase government transparency and accountability. To accomplish this, the administration plans to support projects that offer performance gains across agency boundaries, such as the development of a Web-based portal that will allow citizens to apply for federal grants on-line. Making this strategy successful will require the government to address such challenges as implementing appropriate security controls, protecting personal privacy, and maintaining electronic records.

⁵ A knowledge-based economy is one characterized by the production of information and services in which intellectual assets are the central resource.

⁶ See *Managing in the New Millennium: Shaping a More Efficient and Effective Government for the 21st Century* (GAO/T-OCG-00-9, March 29, 2000).

A Coordinated Federal IRM Plan Is Essential to Achieving Results; OIRA's Plan Falls Short

Given the changing environment in which the need for a performance-based federal approach to managing the government's information resources is of paramount importance, strategic planning provides an essential foundation. It defines what an organization seeks to accomplish, identifies the strategies it will use to achieve desired results, and then determines—through measurement—how well it is succeeding in reaching results-oriented goals and achieving objectives. An important element of a strategic plan is that it presents an integrated system of high-level decisions that are reached through a formal, visible process. The plan is thus an effective tool with which to communicate the mission and direction to stakeholders.

However, the CIO Council plan that was prepared to respond to the requirements of the PRA is not an effective and comprehensive governmentwide plan. Specifically, the plan's governmentwide goals (1) are not linked to expected improvements in agency and program performance and (2) do not comprehensively address IRM. In addition, strategies for reaching the goals are incomplete. Additional documents that OIRA cited as supplementing the CIO plan do not address the weaknesses we identified. As a result, agencies are left to address information needs in isolation without a comprehensive vision to unify their efforts. Further, the risk is increased that current and emerging IRM challenges will not be met.

A Strategic Governmentwide IRM Plan Is Required

Over the past 20 years, the Congress has put in place a statutory framework to improve the performance and accountability of executive agencies and to enhance executive branch and congressional decisionmaking. Results-oriented management legislation, coupled with legislation reforming IT, has enabled substantial progress in establishing the basic infrastructure needed to create high-performing federal organizations.

PRA requires OIRA to develop and maintain a governmentwide strategic IRM plan to describe how the federal government will apply information resources to improve agency and program performance. Specifically, this strategic plan was intended to provide a comprehensive vision for the future of IRM in government, and would establish governmentwide goals for using information resources to improve agency and program performance, and describe the strategies, including resources needed, to accomplish these goals.

PRA further stipulates that the strategic IRM plan must include (1) plans for enhancing public access to and dissemination of information using electronic and other formats; (2) plans for meeting the information technology needs of the government; (3) plans for reducing information burdens and meeting shared data needs with shared resources; and (4) a description of progress in applying IRM to improving agency mission performance. The plan is also to be developed in consultation with the archivist of the United States, the administrator of general services, the director of the National Institute of Standards and Technology, and the director of the Office of Personnel Management.

The CIO Council's Strategic Plan Has Been Designated the Governmentwide Plan

Since 1998, OIRA's response to the PRA mandate for a strategic plan has been to jointly publish a strategic plan with the CIO Council. The most recent plan, the *CIO Council Strategic Plan for Fiscal Years 2001-2002*, was issued in October 2000. The development of this plan was the result of extensive discussion, both internally with agency CIOs and with some external stakeholders, such as state and IT industry CIOs.

The CIO Council plan articulates a vision that was used to guide the plan's goals and objectives: *Better government through better use of information, people, processes, and technology*. The plan reflects the Council's view of critical, cross-cutting IT issues that are affecting the federal government's ability to serve its citizens. It also provides background and rationale for the issues, and a brief description of the Council's past accomplishments in each area. For fiscal years 2001–2002, the Council identified six themes that frame the specific goals that accompany them. These goals are as follows:

- Connect all citizens to the products, services, and information of their government.
- Develop interoperable and innovative governmentwide IT initiatives.
- Implement a secure and reliable information infrastructure that the customer can access and trust.
- Develop IT skills and resources to meet mission objectives.
- Collaborate between the public and private sectors to achieve better government.
- Develop investment management policies, practices, and tools that enable improved delivery of government programs and services.

Each goal has a set of associated objectives or major actions needed. A total of 88 detailed initiatives are provided, representing specific, concrete actions that the Council can take to implement its objectives.

The CIO Council Strategic Plan Does Not Meet Most PRA Requirements

While a robust document for the Council, this plan does not constitute an effective governmentwide strategic IRM plan under PRA. First, although the plan establishes a number of goals that are clearly governmentwide in nature, these goals are not linked to expected improvements in agency and program performance. For example, the plan contains a governmentwide goal of interoperable and innovative IT initiatives; however, the plan does not discuss how these initiatives will improve agency performance or establish targets for improvement. Further, the plan's goals do not address IRM comprehensively; for example, statistical activities, records management, and the collection and control of paperwork are not addressed.

Second, while the plan contains strategies for reaching the goals, these strategies are incomplete. Specifically, the plan does not address, even at a high level, OIRA's policymaking and oversight role in helping to attain those goals. Further, the plan does not discuss the resources needed governmentwide—by OIRA, the CIO Council, and federal agencies—to achieve its goals.

Finally, the plan addresses some but not all of the remaining items highlighted in PRA. Specifically:

- The plan does address enhancing public access to and dissemination of information. The first goal—connecting all citizens to the products, services, and information of their government—is focused on making government information accessible and facilitating transactions with citizens. Strategies to accomplish this goal included developing the *FirstGov.gov* portal for government services.⁷
- The plan includes a discussion of meeting the IT needs of the government. Specifically, goal six focuses on IT investment management practices and tools to improve delivery of government services and programs. Strategies include improving the quality of data used to support investment decisionmaking, information technology acquisition strategies, and IT performance measurement.
- It does not address reducing the information burden to the public. While it includes goals and strategies that may ultimately result in burden reduction—such as creating interoperable and innovative governmentwide initiatives—they are not linked to burden reduction. The plan also does

⁷ *FirstGov.gov* is a Web site that is intended to serve as a portal to all of the federal government's publicly available, on-line information services.

not include a discussion of meeting shared data needs with shared resources, as required by the act.

- Notably lacking in the plan is any description of progress already made in applying IRM principles to improving agency performance and mission accomplishment. Further, the plan's performance measures are not geared toward providing the required information on progress. These measures are solely focused on gauging Council progress in meeting the goals, rather than on progress in improving agency and program performance.

In regard to the consultations required by PRA, representatives of key agencies currently sit on the Council and, thus, participated in the development of the plan, according to OIRA and CIO Council officials. OMB officials also indicated that by conducting meetings with these agencies, and through other guidance and review activities, the strategic viewpoint of these senior officials was captured.

In discussing our views of the CIO Council plan, OMB officials responded that while the CIO Council plan is OIRA's primary means of complying with the strategic planning requirements under PRA, OMB produces a range of other documents that also contain elements of the governmentwide plan. It is this collection of documents, as a whole, that constitutes the governmentwide strategic IRM plan under PRA. According to OMB officials, these additional documents are as follows:

- **Government Information Security Reform Act.** Under this act, agencies are required to report to OMB annually on independent evaluations of their information security programs. OMB is then required to summarize these reports; OMB officials said that this summary provides strategic direction for the security area. Agencies reported to OMB in September 2001; OMB issued the governmentwide summary on February 13, 2002.
- **Budget Information.** OMB officials cited two budget documents that provide governmentwide strategic direction. According to these officials, Table 22-1 in the budget sets strategic direction for IT and e-government and discusses agency performance. In addition, these officials stated that the exhibit 53s, submitted by agencies as part of the budget process, provide specific performance information on planned spending for major and significant information systems. In addition, the chief statistician cited the annual OMB report, *Statistical Programs of the United States Government*, which describes proposed funding and priority activities for federal statistics.
- **Plans Under the Government Paperwork Elimination Act.** Under this act, agencies are required to report to OMB on their plans for providing

the public with the option of submitting, maintaining, and disclosing required information electronically, instead of on paper. OIRA has summarized these plans in a database which, according to OIRA, provides part of the strategic direction for IRM. In September 2001,⁸ we reported on the status of agency implementation of the act. We found that although agency implementation plans submitted in October 2000 included much potentially useful information, many omissions and inconsistencies were evident. In addition, we noted that the plans did not provide sufficient information regarding agencies' strategic actions that could minimize the risk of not meeting the deadline for providing electronic options. We concluded that given these shortcomings, OMB would be challenged in its oversight role of ensuring that agencies comply with the act. In commenting on this report, OMB officials noted that in October 2001, they collected additional information from agencies to address these issues; we did not review this additional information.

- **The Information Collection Budget.** Each year, OIRA publishes an Information Collection Budget by gathering data from executive branch agencies on the total number of burden hours⁹ OIRA approved for collection of information at the end of the fiscal year, and agency estimates of the burden for the coming fiscal year. This document includes a governmentwide goal for burden reduction and reports the reasons for any increasing burden. It also highlights agency efforts to streamline and reduce information collections from the public for the upcoming fiscal year.
- **The National Archives and Records Administration (NARA) Strategic Plan.** OMB officials stated that this plan provides a strategy for how NARA plans to fulfill its mission and that agency records managers regard this plan as providing strategic direction for their own activities.
- **The President's Management Agenda.** Again, according to OMB officials, the e-government goal contained in the president's management agenda provides a strategic vision for expanding the use of e-government. According to OMB officials, this will soon be supplemented by a report specifically on the e-government initiative, which will further address strategic direction for e-government.

⁸ *Electronic Government: Better Information Needed on Agencies' Implementation of the Government Paperwork Elimination Act* (GAO-01-1100, September 28, 2001).

⁹ "Burden hours" are the principal units of measure of paperwork burden. Burden hours are generally calculated as a function of estimates of (1) the amount of time it will take an individual to collect and provide information and (2) the number of individuals an information collection affects.

These documents—whether viewed individually or in total—do not address the weaknesses we have identified. Of these documents, one report stands out as governmentwide and strategic—the president’s management agenda, which articulates the goal of expanding e-government as well as strategies for accomplishing that goal. Although this agenda adds additional perspective on the administration’s strategic direction for certain aspects of IRM, it is not broad enough to compensate for the weaknesses in the CIO Council plan. In addition, the current NARA strategic plan for fiscal years 1997–2007 includes no governmentwide goals and strategies for records management. Rather, NARA’s articulated goals and strategies focus on the mission of the agency: providing ready access to information that documents citizens’ rights, officials’ actions, and the national experience. The remaining documents deal with various aspects of the government’s use of information resources, but are not strategic or focused on the future, and do not provide goals, strategies, and performance measures.

Further, the multitude of documents—issued at different points in time—that OIRA indicated comprise the governmentwide plan are neither integrated nor formalized in any way. Nor is there any published tool to identify and locate these documents, should agencies, the Congress, or other stakeholders want to view the plan in its totality. As a result, these documents do not clearly communicate the strategic IRM vision of the government.

The shortcomings we have identified in the current plan indicate that OIRA has not devoted sufficient attention to producing an effective governmentwide strategic IRM plan. As a result, agencies are left to address information needs in isolation without a comprehensive vision to unify their efforts. Further, the risk is increased that investments in IT will not be leveraged across the government; that duplicative initiatives will be undertaken; that opportunities for data sharing and public access will be missed; that privacy will be compromised; and that the security of information, information systems, and critical infrastructure will be jeopardized. Without OIRA leadership, top-level management commitment, and the application of appropriate resources to ensure the development of a comprehensive and meaningful plan, the mounting challenges that the government faces in managing information may not be met.

OIRA Has Responded to PRA Policy, Oversight, and Functional Responsibilities

While the CIO Council's strategic plan does not effectively serve as the governmentwide vehicle envisioned under PRA, OIRA is responding to other PRA policymaking, oversight, and functional requirements. OIRA officials see themselves as having provided leadership in IRM, and point to the successful resolution of the Year 2000 problem as among OMB's greatest accomplishments over the last 5 years. They also cite the establishment of *FirstGov.gov* as a major accomplishment. We agree that these are significant. In fact, our work on the Year 2000 issue specifically acknowledged the important role that OMB played in leading, coordinating, and monitoring federal activity.¹⁰ And in 2000 we testified that *FirstGov.gov* represented an important, previously unavailable capability that was rapidly and successfully put into place.¹¹

Regarding the development of general IRM policy, OIRA officials said that they see policymaking as a primary responsibility. OIRA most recently updated Circular A-130, Management of Federal Information Resources in November 2000 to incorporate changes resulting from the Clinger-Cohen Act of 1996 and subsequent policies outlined in OMB Circular A-11. This version of Circular A-130 specifically incorporates the requirements that agencies focus IRM planning to support their strategic missions, implement a capital planning and investment control process that links to budget formulation and execution, and rethink and restructure their business processes before investing in information technology.

In terms of oversight, according to OIRA officials, they leverage existing statutory processes, including reviews of the budget, proposed agency information collections, regulations, legislation, and systems of records¹² under the Privacy Act to oversee agency IRM activities. Additionally, they noted that they work with agency CIOs through the budget process, Government Performance and Results Act reporting, and information-collection reviews to further policy oversight. OIRA officials also emphasized their work with the CIO Council and other interagency groups as a means of overseeing agency activities. They stressed that OMB is not

¹⁰ *Year 2000 Computing Challenge: Lessons Learned Can Be Applied to Other Management Challenges* (GAO/AIMD-00-290, September 12, 2000).

¹¹ *Electronic Government: Opportunities and Challenges Facing the FirstGov Web Gateway* (GAO-01-87T, October 2, 2000).

¹² Under the Privacy Act of 1974, any group of records under the control of an agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.

an audit organization, and that A-130 requires agencies to monitor their own compliance with IRM policies, procedures, and guidance.

OIRA has also taken action to respond to the specific IRM functional responsibilities in PRA: information collection, dissemination, statistical policy and coordination, records management, privacy and security, and IT. Since 1995, OMB has issued guidance in each of these areas including on such topics as Internet privacy, dissemination, and information technology. In addition, it has responded to specific requirements by reviewing and approving proposed agency information collections, appointing a chief statistician to coordinate statistical activities, seeking statutory authority to expand data sharing among statistical agencies, and working with the CIO Council to improve IT management. The full range of these actions are recounted in appendix II.

Our past work demonstrates, however, that OIRA faces continuing and new challenges in each of these areas. For example:

- **Information Collection/Burden Reduction.** Over the past 3 years, we have reported that federal paperwork has continued to increase. For example, in April 2001, we reported that paperwork had increased by nearly 180 million burden hours during fiscal year 2000—the second largest 1-year increase since the act was passed.¹³ This increase was largely attributable to the Internal Revenue Service, which raised its paperwork estimate by about 240 million burden hours. We also reported that PRA violations—in which information-collection authorizations from OMB had expired or were otherwise inconsistent with the act’s provisions—had declined from 710 to 487, but were still a serious problem. We concluded that while OIRA had taken some steps to limit violations, more needed to be done, including taking steps to work with the budget side of OMB to bring agencies into compliance.¹⁴ In commenting on this report, OMB officials noted that in November 2001, the OIRA administrator and OMB general counsel sent a memorandum to agencies stressing the importance of having agencies eliminate existing violations and prevent new ones.

¹³ *Paperwork Reduction Act: Burden Estimates Continue to Increase* (GAO-01-648T, April 24, 2001).

¹⁴ *Paperwork Reduction Act: Burden Increases at IRS and Other Agencies* (GAO/T-GGD-00-114, April 12, 2000) and *Paperwork Reduction Act: Burden Increases and Unauthorized Information Collections* (GAO/T-GGD-99-78, April 15, 1999).

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- **Information Dissemination.** Two recent reports underscored the evolving nature of information dissemination issues and the challenges that the government faces in moving toward increased electronic dissemination of information. One on the National Technical Information Service (NTIS)—a repository for scientific and technical information—stated that rising demand for electronic products, coupled with increasing availability of this information on the Internet, raised fundamental issues about how the information should be collected, stored, and disseminated—and specifically, about the future of NTIS itself.¹⁵ Specifically, we raised policy questions concerning whether a central repository was still needed and if so, how it should be structured. In addition, our report on the Government Printing Office—which prints and disseminates publications for all three branches of government—concluded that while electronic dissemination of government publications provided an attractive alternative to paper, a number of challenges would need to be overcome if the government were to increase electronic dissemination. These challenges included ensuring permanence, equitable access, and authenticity of documents in an electronic environment.¹⁶
 - **Statistical Policy.** In March 1998, in testimony on a reorganization proposal involving part of the federal statistical system, we summarized our past work in this area.¹⁷ We concluded that the inability of agencies to share data is one of the most significant issues facing the statistical system, and one of the major factors affecting the quality of data, the efficiency of the system, and the amount of burden placed on those who provide information to the agencies.¹⁸
 - **Records Management.** Last July we testified that the management of electronic records was a substantial challenge facing the government and the National Archives and Records Administration in implementing the Government Paperwork Elimination Act and in moving toward e-

¹⁵ *Information Management: Dissemination of Technical Reports* (GAO-01-490, May 18, 2001).

¹⁶ *Information Management: Electronic Dissemination of Government Publications* (GAO-01-428, March 30, 2001).

¹⁷ *Statistical Agencies: Proposed Consolidation and Data Sharing Legislation* (GAO/T-GGD-98-91, March 26, 1998).

¹⁸ See also *Record Linkage and Privacy: Issues in Creating New Federal Research and Statistical Information* (GAO-01-126SP, April 2001), which discusses the benefits from and the privacy issues raised by record linkages—combining multiple sources of existing data—conducted for research and statistical purposes.

government.¹⁹ We underscored the need for strong, central leadership to overcome this challenge.

- **Privacy.** In September 2000, we reported that most Web sites we reviewed had posted privacy policies but had not consistently posted policies on pages we identified as collecting substantial amounts of personal information. We concluded that OMB's guidance was unclear in several respects, and contained undefined language.²⁰ And last April we reported on agency use of Internet "cookies"²¹ and concluded that OMB's guidance left agencies to implement fragmented directives contained in multiple documents. Further, the guidance itself was not clear on the disclosure requirements for a certain type of cookie.²²
- **Information Technology.** In last January's Performance and Accountability Series of reports, we identified information technology management—including improving the collection, use, and dissemination of government information; strengthening computer security; and strengthening IT management processes—as a major management challenge facing the federal government.²³ We pointed out that the momentum generated by the government's response to the Year 2000 change should not be lost, and that the lessons learned should be considered in addressing other pressing challenges. The report further reemphasized the need for sustained and focused central leadership, and particularly for a federal chief information officer to provide strong focus and attention to the full range of IRM and IT issues.
- **Information Security.** Since 1997, we have designated information security as a high-risk area because growing evidence indicated that controls over computerized federal operations were not effective and related risks were escalating, in part due to increasing reliance on the Internet.²⁴ While many actions have been taken, current activity is not

¹⁹ *Electronic Government: Challenges Must Be Addressed With Effective Leadership and Management* (GAO-01-959T, July 11, 2001).

²⁰ *Internet Privacy: Agencies' Efforts to Implement OMB's Privacy Policy* (GAO/GGD-00-191, September 5, 2000).

²¹ Text files that have unique identifiers associated with them and are used to store and retrieve information that allows Web sites to recognize returning users, track on-line purchases, or maintain and serve customized Web pages.

²² *Internet Privacy: Implementation of Federal Guidance for Agency Use of "Cookies"* (GAO-01-424, April 27, 2001).

²³ *Major Management Challenges and Program Risks: A Governmentwide Perspective* (GAO-01-241, January 2001).

²⁴ *High-Risk Series: An Update* (GAO-01-263, January 2001).

keeping pace with the growing threat. In recent testimony,²⁵ we reported that our most recent analyses of audit reports published from July 2000 through September 2001, continued to show significant weaknesses at each of the 24 agencies included in our review. Consequently, critical operations, assets, and sensitive information gathered from the public and other sources continued to be vulnerable to disruption, data tampering, fraud, and inappropriate disclosure. While recognizing that the administration had taken a number of positive steps to protect critical public and private information systems, we concluded that the government still faced a challenge in ensuring that risks from cyber threats are appropriately addressed in the context of the broader array of risks to the nation's welfare. Further, we recommended that the federal government's strategy for protecting these systems define (1) specific roles and responsibilities, (2) objectives, milestones, and an action plan, and (3) performance measures.

Over the years, we have made numerous recommendations to both OMB and the agencies on IRM matters. While actions have been taken to respond to our recommendations, more needs to be done. Some of the more significant recommendations involving OIRA that have not yet been implemented include the following:

- In 1996, in reporting on Clinger-Cohen Act implementation, we recommended that OMB identify the type and amount of skills required for OMB to execute IT portfolio analyses; determine the degree to which these needs are currently satisfied; specify the gap; and design and implement a plan to close the gap.²⁶ Although OIRA officials said they are examining their staffing needs, no systematic review has been conducted to date.
- In the same 1996 report, we recommended that OMB evaluate information system project cost, benefit, and risk data when analyzing the results of agency IT investments. Such analyses should produce agency track records that clearly and definitively show what improvements in mission performance have been achieved for the IT dollars expended. Although OMB has provided anecdotal evidence of expected and actual mission performance improvements for some major systems projects, it is not

²⁵ *Computer Security: Improvements Needed to Reduce Risk to Critical Federal Operations and Assets* (GAO-02-231T, November 9, 2001).

²⁶ *Information Technology Investment: Agencies Can Improve Performance, Reduce Costs, and Minimize Risks* (GAO/AIMD-96-64, September 30, 1996).

clear that OMB has constructed or plans to construct systematic agency track records.

- In 1998, in a report on OIRA's implementation of PRA, we recommended that OMB ensure that its annual performance plan and program reports to the Congress under the Government Performance and Results Act identify specific strategies, resources, and performance measures that it will use to address OIRA's PRA responsibilities.²⁷ OMB has not acted on this recommendation.
- In 2000, in a report on Internet privacy, we recommended that OMB (1) consider how best to help agencies better ensure that individuals are provided clear and adequate notice about how their personal information is treated when they visit federal Web sites, and (2) determine whether current oversight strategies are adequate.²⁸ In addition, in reporting on federal agency use of Internet cookies, we recommended that OMB unify its guidance on Web site privacy policies and clarify the resulting guidance to provide comprehensive direction on the use of cookies by federal agencies on their Web sites.²⁹ Although OIRA officials said that they plan to launch a privacy initiative to address these recommendations, no action has been taken to date.

Conclusions

Current and emerging challenges—including the events of September 11 and the subsequent anthrax attacks—emphasize the importance of the integrated approach that IRM embodies and the need for a strategic plan to guide the government's management of its increasingly valuable information resources. However, OIRA has not established an effective governmentwide strategic IRM plan to accomplish this. Given the magnitude of the changes that have occurred since the CIO Council plan was published in October 2000, OIRA has both an obligation and an opportunity to lead the development of a unified governmentwide plan that

- communicates a clear and comprehensive vision for how the government will use information resources to improve agency performance,

²⁷ *Regulatory Management: Implementation of Selected OMB Responsibilities Under the Paperwork Reduction Act* (GAO/GGD-98-120, July 9, 1998).

²⁸ GAO/GGD-00-191, September 5, 2000.

²⁹ GAO-01-424, April 27, 2001.

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- is responsive to the current external environment including the impact of recent terrorist attacks and other trends,
 - recognizes the resources including human capital needed to achieve governmentwide IRM goals, and
 - reflects consultation with all stakeholders—including the Office of Homeland Security, entities involved in information security and critical infrastructure protection, and the officials identified in the act—who are critical to meeting IRM challenges and the goals the administration has established in its management agenda.

The shortcomings we identified in the CIO Council plan call into question the degree of management attention that OIRA has devoted thus far to producing the governmentwide plan. Without such a plan, OIRA and the agencies lack a unifying governmentwide vision for how investments in and use of information resources will facilitate the current and emerging agenda of the federal government. Further, the risk is increased that investments in IT will not be leveraged across the government; that duplicative initiatives will be undertaken; that opportunities for data sharing and public access will be missed; that privacy will be compromised; and that the security of information, information systems, and critical infrastructure will be jeopardized. Without OIRA leadership, top-level management commitment, and the application of appropriate resources to ensure the development of a comprehensive and meaningful plan, the mounting challenges that the government faces in managing information may not be met.

While OIRA has not yet established an effective governmentwide IRM plan, it has taken action to respond to other PRA policymaking, oversight, and functional requirements. Nevertheless, OIRA faces challenges in managing critical information resources and many of the recommendations we have made over the years have not yet been implemented.

Recommendations

In order to address the current and emerging challenges that the government faces in managing information resources and take advantage of opportunities for improvement, we recommend that the administrator, OIRA, develop and implement a governmentwide strategic IRM plan that articulates a comprehensive federal vision and plan for all aspects of government information. In addition, recognizing the new emphasis that OMB has placed on e-government, it will be important that the administrator work in conjunction with the associate director for

technology and e-government in developing this plan. In particular, the following actions should be taken:

- Consistent with the Paperwork Reduction Act, establish governmentwide goals for IRM that are linked to improvements in agency and program performance, identify strategies for achieving the goals that clearly define the roles of OIRA and agencies, and develop performance measures to assess progress in using IRM to improve agency and program performance.
- Assess the external environment and emerging future challenges and trends, including the recent terrorist attacks, and their impact on the government's collection, use, maintenance, and dissemination of information.
- As part of an assessment of the government's internal environment, determine the resources, including human capital, needed to meet governmentwide IRM goals. This should include an assessment of OIRA's human capital capability, including the numbers of staff and types of skills needed, to conduct this strategic planning process and lead governmentwide implementation of the resulting plan. Based on this assessment, the administrator, OIRA, should seek to fill any gaps identified.
- Seek involvement in the planning processes from the CIO Council, the Office of Homeland Security, entities involved in information security and critical infrastructure protection, federal agencies, private-sector organizations, state and local governments, and other relevant stakeholders in meeting the government's needs for a strong and unified information management vision.

Agency Comments and Our Evaluation

In written comments on a draft of this report, which are reprinted in appendix III, the director, OMB, recognized that our report had significant implications for agency PRA implementation but expressed several concerns with its contents. First, he expressed concern that the report narrowly focuses on the finding that a governmentwide strategic plan must be a single document. He reiterated OMB's position that the documents they cited during our review—the CIO Council Strategic Plan, the information collection budget, the president's management agenda, and others—and the president's budget for 2003, which was released after our draft report was sent for comment—in total meet the requirements for a governmentwide strategic IRM plan and provide adequate strategic direction to agencies. Second, the director expressed concern that the report does not incorporate the role of the associate director for information technology and e-government into its findings or analysis.

The director stated that, in leading implementation of the e-government strategy outlined in the president's management agenda, the associate director provides strategic direction to agencies for many of the functions in PRA, including information security, privacy, e-government, IT spending, enterprise architecture, and capital planning, and leads the work of OIRA and other OMB offices to improve agency performance on these issues. Lastly, the director stated that the report does not analyze the impact of OMB's policies and practices—established in response to the requirements of PRA and other IRM statutes—on agency performance. He further stated that such an analysis would demonstrate that the president's e-government initiative and other actions are highly effective in carrying out the purposes of PRA.

We disagree with the director's statement that our report narrowly focuses on the requirement for a strategic plan to be a single document. We performed a rigorous analysis of the documents cited by OMB during our review and compared their contents against the requirements of the PRA. Our primary finding was that these documents do not, separately or collectively, meet the requirements for a governmentwide plan. As discussed in our report, we acknowledge the strategic elements of the CIO Council plan and the president's management agenda but found that these documents do not comprehensively cover IRM issues and are missing other key elements of a strategic IRM plan. The remaining documents cited by OMB are not strategic or focused on the future, and do not provide goals, strategies, and performance measures. Further, we think there is value in crafting a single plan—not only because it is required by PRA but also because it would provide a vehicle for clearly communicating an integrated strategic IRM vision to agencies, the Congress, and the public. However, contrary to what OMB's letter implies, we do not believe that OMB must necessarily produce an entirely new document to accomplish this. OMB has options for building on past efforts—including the CIO council strategic plan, the president's management agenda, and the president's budget for 2003—to develop a plan that contains a comprehensive strategic statement of goals and resources.

Regarding the budget for 2003—released after our draft report was sent for comment—this document identifies e-government and IT management reform as administration priorities. Specifically, it contains (1) a description of IT management issues including duplicative IT investments and the failure of IT investments to significantly improve agency performance, (2) additional information on the administration's e-government goals and strategies and high-level descriptions of specific e-

government initiatives, (3) descriptions of agency progress in developing capital planning and investment control processes, enterprise architectures, and business cases for IT projects, and in implementing e-government, and (4) identifies process improvement milestones for calendar year 2002.

The budget also contains a scorecard used to grade agency progress in the five governmentwide initiatives—including e-government—described in the president’s management agenda. In addition, for major IT investments, the budget identifies total investments for 2001 through 2003, links each investment to the agency’s strategic goals, and provides performance goals and measures for these projects. The budget also contains a discussion on strengthening federal statistics and identifies four programs supported by the budget that are intended to address shortcomings in the statistical infrastructure.

Our preliminary analysis indicates that this budget contains many of the elements required in a strategic plan that were not present in previous documents cited by OMB and, when viewed in conjunction with the president’s management agenda, represents credible progress toward developing a governmentwide plan. Specifically, it includes a discussion—within the context of e-government—of how the government will use information resources to improve agency performance, and identifies goals and strategies. It also discusses other required elements, including (1) enhancing public access to and dissemination of information and (2) meeting the IT needs of the government, and cites the need to reduce reporting burden on businesses and share data among federal agencies. Further, it provides the status of agency-by-agency progress in establishing IT management processes and implementing e-government and the scorecard provides a means of measuring agency progress. The discussion also links improving information sharing among levels of government to providing for homeland security.

However, some of the areas that the budget does not appear to address include (1) the role of OIRA and the CIO Council in implementing the government’s strategies, (2) an assessment of the long-term resources (beyond fiscal year 2003)—including human capital—needed to meet the goals, and (3) how key stakeholders were involved in developing these plans. Nevertheless, based on a preliminary review of this document, it appears to address, in part, the recommendations in this report. We intend to follow up on this and other documents that OMB has indicated are forthcoming to determine the extent to which our recommendations are fully addressed.

We acknowledge the role that OMB has given to the associate director to provide strategic direction to agencies and we support additional efforts to focus attention on IRM matters, especially given the magnitude of the government's challenges. However, we believe that a governmentwide strategic IRM plan is nonetheless needed to communicate an integrated IRM vision to the Congress and other key stakeholders, as well as federal agencies. As a result, we have modified our recommendations to recognize the importance of the administrator's working in conjunction with the associate director to articulate a comprehensive IRM vision and develop a governmentwide plan that meets PRA requirements.

Finally, we acknowledge that we did not assess the impact of OIRA's policymaking and oversight efforts—performed in response to the requirements of the PRA and other IRM legislation—on agency performance. However, our past work, referenced in this report, provides ample evidence of agency performance problems in such areas as IT management, security, privacy, and data sharing and confirms that OMB faces significant and continuing challenges in these areas. Further, as discussed in our report, our past work led to our identifying information security as a governmentwide high-risk area and IT management as a major management challenge. In fact, OMB identifies some of these same performance problems in its budget for 2003 and in its related assessments of agency progress in expanding e-government. In addition, we note that the president's e-government initiative is clearly in its early stages; any efforts to evaluate its impact on agency performance at this time would be premature.

The deputy administrator, OIRA, and other officials also separately provided oral technical comments, which we have incorporated as appropriate.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the date of this letter. At that time, we will provide copies to the ranking minority member, Senate Committee on Governmental Affairs; the chairman and ranking minority member, House Committee on Government Reform; and the director, Office of Management and Budget. Copies will also be available on our Web site at www.gao.gov.

If you have any questions, please contact me at (202) 512-6240 or Patricia D. Fletcher, assistant director, at (202) 512-4071. We can also be reached by e-mail at koontzl@gao.gov and fletcherp@gao.gov, respectively. Key contributors to this report were Michael P. Fruitman, Ona M. Noble, Robert P. Parker, Colleen M. Phillips, and David F. Plocher.

Sincerely yours,



Linda D. Koontz
Director, Information Management Issues

Appendix I: Scope and Methodology

To evaluate the adequacy of OIRA's strategic planning efforts, we performed a content analysis of the Federal Chief Information Officers (CIO) Council Strategic Plan for fiscal years 2001–2002—which OIRA officials identified as the governmentwide IRM plan—and compared it with specific PRA requirements (S 3505 A). We also interviewed OIRA and CIO Council officials to obtain information on the plan's preparation. We reviewed our prior reports for information on evaluations and recommendations made for previous OIRA governmentwide strategic IRM plans. Further, to understand the challenges the government faces in managing information in today's environment, we reviewed our more recent reports on terrorism, bioterrorism, and homeland security issues. In addition, we reviewed *The President's Management Agenda for Fiscal Year 2002*.

We also reviewed additional documents that, according to OIRA, also comprise the governmentwide IRM plan. These included the 1997-2007 Strategic Plan of the National Archives and Records Administration, OMB's Information Collection Budget, the exhibit 53s and table 22-1 in the president's budget for fiscal year 2002, and OMB's *Statistical Programs of the United States Government*. We also reviewed OMB memoranda to agencies entitled *Procedures and Guidance on Implementing the Government Paperwork Elimination Act* (April 25, 2000), *Guidance for Preparing and Submitting Security Plans of Action and Milestones* (October 17, 2001), and *Implementation of the President's Management Agenda and Presentation of the Fiscal Year 2003 Budget Request* (October 30, 2001). Finally, we reviewed the president's budget for fiscal year 2003 after it was released on February 4, 2002.

To determine OIRA actions to respond to specific IRM functional requirements, we reviewed OMB circulars, bulletins, memoranda, and other documents. In addition, we interviewed OIRA officials responsible for each of the functional areas. We reviewed our prior work on this subject, and assessed OIRA's status regarding outstanding recommendations. We focused primarily on actions taken by OIRA since 1995, the date of the most recent PRA amendments. However, we did not assess the adequacy of OIRA's actions to respond to these requirements.

Appendix II: Key Requirements of the Paperwork Reduction Act and OIRA Actions

OIRA requirements	Actions taken
Section 3504(b): General IRM Policy	
Develop and oversee the implementation of uniform information resources management policies, principles, standards, and guidelines.	<ul style="list-style-type: none"> OMB revised its IRM policy guidance, Circular No. A-130, to reflect the 1995 Act and to reflect the Clinger-Cohen Act of 1996 and other matters. Circular A-130 complements 5 CFR 1320, "Controlling Paperwork Burden on the Public." OIRA's general approach to oversight is to leverage its existing statutory processes, including the budget, regulatory review, information collection review, legislative review, Privacy Act systems of record review, and periodic reports from the agencies.
Foster greater sharing, dissemination, and access to public information, including through <ul style="list-style-type: none"> the use of the Government Information Locator Service (GILS); and the development of utilization of common standards for information collection, storage, and processing and communications, including standards for security interconnectivity. 	<ul style="list-style-type: none"> OIRA officials acknowledged that GILS is still a requirement; however, they stated that increased use of the Internet, coupled with the development of more powerful search engines, has lessened the importance of this approach to locating government information. They highlighted the establishment of FirstGov.gov—a federal government portal that provides a single point of access to all federal government information posted on the World Wide Web—as a major accomplishment in this area. In addition, OIRA has worked with the CIO Council to establish Access America portals in the areas of health, trade, students, and seniors. OIRA does not set technical standards; OMB works with NIST and consults with the CIO Council to define policy standards for operational matters.
Initiate and review proposals for changes in legislation, regulations, and agency procedures to improve information resources management practices.	<ul style="list-style-type: none"> OIRA officials say they do not initiate legislative proposals, but review them via consultation with the CIO Council, individual agencies, and OMB's Legislative Reference Division. Altogether, OIRA receives about 5 or 6 proposals each day. OIRA does not have a systematic process for initiating or reviewing agency procedures to improve IRM.
Oversee the development and implementation of best practices in IRM, including training.	<ul style="list-style-type: none"> OIRA officials stated that they encourage agencies to follow best practices—relying on the CIO Council's leadership and influence. NIST disseminates security best practices.
Oversee agency integration of program management functions with IRM functions.	OIRA officials stressed that agencies are responsible for overseeing their own management functions through the agency's CIO.
Section 3504(c): Collection and Control of Paperwork	
Review and approve proposed agency collections of information.	OIRA operates the paperwork clearance process established under the Paperwork Reduction Act of 1980. OIRA has draft guidance for agency compliance with the PRA's paperwork clearance requirements (preliminary January 1997 draft, revised August 1999). In fiscal year 2001, OIRA reviewed 1,521 proposed agency collections, approved 1,411, and disapproved 5. The remainder were withdrawn or returned to the agency.
Coordinate the review of information collection concerning procurement and acquisition with the Office of Federal Procurement Policy (OFPP).	According to OIRA, the desk officers responsible for information collection review routinely coordinate collections concerning procurement and acquisition with OFPP, but such coordination is not documented.
Minimize information collection burden and maximize the practical utility of and public benefit from information collected.	According to OIRA, the information collection review process is used to minimize information collection burden and maximize practical utility and public benefit.
Establish and oversee standards and guidelines for estimated paperwork burden.	OIRA published standards for estimating paperwork burden in 1999, and oversees implementation through the paperwork clearance process.
Section 3504(d): Information Dissemination	
Develop and oversee the implementation of policies, principles, standards, and guidelines to <ul style="list-style-type: none"> apply to agency dissemination, regardless of form or format; and 	<ul style="list-style-type: none"> In 1995 OMB issued guidance (M-95-22, 9/29/95) on implementing the information dissemination provisions of PRA. This guidance was incorporated into its February 1996 revisions to A-130. According to OIRA officials, OMB has been in consultation with stakeholders and other interested parties to discuss the current information policies of A-130 and to

**Appendix II: Key Requirements of the
Paperwork Reduction Act and OIRA Actions**

OIRA requirements	Actions taken
<ul style="list-style-type: none"> promote public access to information. 	<p>discern if they continues to address the needs of agencies and stakeholders in using government information.</p> <ul style="list-style-type: none"> OIRA officials also said that oversight of this policy is accomplished through the information collection process, conversations with agency CIOs, review of agency Web sites, and discussions with agency personnel.
Section 3504(e): Statistical Policy and Coordination	
<p>Appoint a chief statistician to coordinate the activities of the federal statistical system.</p>	<p>OMB has appointed a chief statistician who heads OIRA's Statistical Policy Branch and is responsible for these functions.</p>
<p>Establish an interagency council on statistical policy to advise and assist OIRA in carrying out these functions.</p>	<p>The PRA of 1995 formalized the Interagency Council on Statistical Policy (ICSP), to advise and assist the director of OMB in carrying out statistical policy and coordination functions. The ICSP is headed by the chief statistician and consists of the heads of major statistical programs as well as representatives of other statistical agencies on a rotating basis.</p>
<p>Prepare an annual report on statistical program funding.</p>	<p>The chief statistician prepares an annual report, entitled <i>Statistical Programs of the United States Government</i>, on the activities of the statistical system, including program funding.</p>
<p>Coordinate the federal statistical system to ensure its efficiency and effectiveness, along with the integrity, objectivity, impartiality, utility, confidentiality of information collected for statistical purposes.</p>	<ul style="list-style-type: none"> According to OMB officials, OIRA uses a variety of mechanisms to coordinate the federal statistical system. These include the budget formulation and information collection review processes; the development and implementation of long-range plans; the issuance and revision of statistical policy standards and orders; consultation with the Interagency Council on Statistical Policy; and the activities and recommendations of interagency committees such as the Federal Committee on Statistical Methodology, the Interagency Committee for the American Community Survey, the Interagency Forum on Aging-Related Statistics, the Interagency Forum on Child and Family Statistics, and the Task Force on One-Stop Shopping for Federal Statistics. In 1997 OMB issued an order on confidentiality covering information collection by statistical agencies. The chief statistician stated that OIRA has not formally evaluated the impact of this order. However, she stated that it has been very useful to some of the statistical agencies, particularly in clarifying that confidential statistical data are not to be used for administrative or regulatory purposes.
<p>Ensure that agency budget proposals are consistent with systemwide priorities.</p>	<p>The Statistical Policy Branch coordinates the budget requests of key multiagency programs to ensure consistency with systemwide priorities. In addition, the budgets of all principal statistical agencies are reviewed by OMB's Resource Management Organizations and the Statistical Policy Branch. According to the chief statistician, the statistical program budgets of other agencies, which account for about 60 percent of the approximately \$4 billion of annual federal spending on statistics, are not covered by this review, primarily because of inadequate detail on budget materials.</p>
<p>Develop and oversee the implementation of governmentwide policies, principles, standards, and guidelines for collection methods, data classifications, dissemination, timely release, and needs for administration of federal programs.</p>	<ul style="list-style-type: none"> Statistical Policy Branch staff participate directly in the review of proposed information collection requests by federal agencies. According to the chief statistician, this participation provides the staff with oversight of the questionnaires and statistical methodologies used to collect information, as well as the use of these collections for federal program needs. OIRA has also expanded or updated classification standards for industries (1997, 2001), occupations (1998), metropolitan and micropolitan areas (2000), and race and ethnicity (1997), and is developing a new product classification system. An OMB policy directive, last updated in 1985, specifies the process for the timely release of principal economic indicators, and requires agencies to conduct periodic evaluations of the quality of those indicators. According to the chief statistician, OIRA does not conduct a formal review of these evaluations, relying on agencies to use them to improve the timeliness and quality of their statistical programs, but does use them in the information collection request and budget formulation processes.

**Appendix II: Key Requirements of the
Paperwork Reduction Act and OIRA Actions**

OIRA requirements	Actions taken
Evaluate statistical program performance and agency compliance with governmentwide policies, principles, standards, and guidelines.	In addition to relying on individual agencies to perform evaluations of statistical programs for compliance with governmentwide polices and guidelines, OIRA uses the information collection and budget review processes to evaluate statistical program performance and compliance.
Promote sharing of information collected for statistical purposes consistent with privacy rights and confidentiality pledges.	<ul style="list-style-type: none"> • OMB prepared legislation that the House of Representatives passed as the Statistical Efficiency Act of 1999. Subsequent President’s budgets have continued to urge enactment of this legislation which would permit data sharing solely for statistical purposes for a specified group of statistical agencies. • To promote data sharing consistent with privacy rights and confidentiality pledges, OMB in 1997 issued a confidentiality order for information collected by statistical agencies. OIRA officials have not formally evaluated the impact of this order, but have noted that some statistical agencies have found it very useful, particularly in clarifying that statistical data collected under a confidentiality pledge are not to be used for nonstatistical purposes, such as administrative or regulatory purposes. • According to the chief statistician, OIRA has, on occasion, used the provisions of 44 U.S.C. 3509 to designate a single agency to collect and share data needed by multiple agencies (consistent with privacy rights and confidentiality pledges), thereby reducing respondent burden.
Coordinate the participation of the United States in international statistical activities.	The Statistical Policy Branch serves as the focal point for coordinating U.S. participation in international statistical activities. OIRA coordinates agency participation in statistical activities with the United Nations Statistical Division, the Organization for Economic Cooperation and Development, and the Statistical Office of the European Communities. The chief statistician represents the United States at meetings of the United Nations Statistical Commission. The chief statistician stated that through this participation, she ensures that U.S. interests are taken into account in these policy-setting forums, where programs for international statistical work are developed and adopted. She noted that in preparation for these meetings, agency views are sought on the agenda items by contacting the member agencies of the ICSP. She also stated that working through the Council, OMB ensures that the appropriate technical experts represent the United States in various subject matter meetings and in international standards development work.
Promote opportunities for training in statistical policy functions.	According to the chief statistician, the Statistical Policy Branch encourages agencies to send staff to OIRA to be trained. For each of the past 6 years, agency staff have worked at OIRA, participating in such activities as the preparation of the annual report on statistical programs and the review of information collection requests.
Section 3504(f): Records Management	
Provide advice and assistance to the Archivist of the United States and the Administrator of General Services to promote coordination of records management requirements with IRM policies, principles, standards, and guidelines.	<ul style="list-style-type: none"> • OMB officials stated that OIRA relies heavily on NARA to take leadership for records management policy. • OIRA officials stated that they and OMB budget examiners work closely with both NARA and GSA. They have provided advice countless times, but these interactions are informal and therefore undocumented.
Review agency compliance with records management legal and regulatory requirements.	OIRA relies on NARA to ensure compliance with records management requirements processes. From fiscal years 1996 through 2000, NARA conducted 16 evaluations of agency records programs—including Agriculture, Defense, Commerce, FBI, and CIA—and reported numerous weaknesses, making recommendations for improvement. No additional evaluations have been conducted since then.
Oversee the application of records management policies, principles, standards, and guidelines, including the requirements for archiving information maintained in electronic	<ul style="list-style-type: none"> • OMB Circular A-130 requires agencies to ensure that records management programs adequately document agency activities and incorporate records management functions into the design, development, and implementation of information systems.

**Appendix II: Key Requirements of the
Paperwork Reduction Act and OIRA Actions**

OIRA requirements	Actions taken
format, in the planning and design of information systems.	<ul style="list-style-type: none"> OIRA officials stated that they oversee agency application of records management policies through the information collection budget and review processes. According to OMB officials, an e-government initiative on e-records management will provide a framework for this.
Section 3504(g): Privacy and Security	
Develop and oversee the implementation of policies, principles, standards, and guidelines on privacy, confidentiality, security, disclosure and sharing of information, and security.	OMB Circular A-130 provides implementing guidance to agencies on security and privacy. In addition, it contains specific guidance on federal agency responsibilities for maintaining records about individuals (app. I) and on security of federal automated information resources (app. III). Further, OIRA has issued several memoranda addressing such issues as interagency data sharing, Internet privacy issues, and the need to incorporate security and privacy in information systems design and investment.
Oversee and coordinate compliance with the Freedom of Information Act, the Privacy Act, and the Computer Security Act of 1987, and related information management laws.	According to OIRA, it oversees and coordinates compliance with the Computer Security Act through the provisions of the Government Information Security Reform Act that require agencies to engage in systematic self-reporting on their computer security programs. OIRA oversees the Privacy Act through its reporting requirements and review of agency notices for new or modified Privacy Act systems of records. Freedom of Information Act oversight is given to the Department of Justice, although OMB provides guidance on fees. OIRA also receives and reviews all agency inspector general reports and annual reports, monitors GSA's incident report tracking system, and reviews the integration of IT security in the budget process and the capital planning and investment control process.
Require agencies to identify and afford security protections commensurate with the risk and management of the harm resulting from the loss, misuse, or unauthorized access to or modification of information.	A-130 requires a risk-based approach to information security and stipulates that new or continued funding for IT systems is contingent on meeting security criteria. OIRA officials again emphasized that it is the individual agency's responsibility to provide appropriate risk-based security protections.
Section 3504(h): Federal Information Technology	
In consultation with the Director of NIST and the Administrator of General Services, develop and oversee the implementation of policies, principles, standards, and guidelines for information technology functions and system standards.	According to OIRA officials, OIRA staff routinely consult with NIST and the General Services Administration in developing policy and guidance.
Monitor the effectiveness of, and compliance with, directives issued under the Clinger-Cohen Act and relative to the IT fund.	OIRA holds annual capital planning and investment control meetings with individual agencies to judge the well being of IT portfolios. OIRA officials stated that they maintain a database to track agency portfolios over time, but consider this information to be "pre-decisional"; it was thus not made available to us. However, additional detail on agency IT portfolios was provided in the 2003 budget.
Coordinate the development and review of IRM policy associated with procurement and acquisition with the Office of Federal Procurement Policy.	OIRA officials collaborate with the Office of Federal Procurement Policy on issues related to IT procurement and acquisition.
Ensure (1) agency integration of IRM plans, program plans, and budgets for acquisition and use of IT; and (2) the efficiency and effectiveness of interagency IT initiatives.	OIRA officials use the budget and capital planning processes, in addition to the guidance in A-130, to ensure agency integration of IRM plans and budgets.

**Appendix II: Key Requirements of the
Paperwork Reduction Act and OIRA Actions**

OIRA requirements

Promote the use of IT to improve the productivity, efficiency, and effectiveness of federal programs.

Actions taken

- OIRA works closely with the CIO Council to ensure the efficiency and effectiveness of interagency IT initiatives.
 - OIRA promotes the use of information technology by participating in interagency meetings, through the information collection review process, and desk officer liaison activities with agencies.
 - According to OIRA officials, OIRA uses requirements for capital planning and investment control processes, enterprise architectures, and business cases during the budget process to improve how agencies plan, acquire, and manage IT.
-

Appendix III: Comments from the Office of Management and Budget



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D. C. 20503
February 11, 2002

THE DIRECTOR

Mr. Joel C. Willemsen
Managing Director, Information Technology Issues
U.S. General Accounting Office
Washington, DC 20548

Dear Mr. Willemsen:

Thank you for the opportunity to respond to the General Accounting Office's (GAO) draft report, "Information Resources Management: Comprehensive Strategic Plan Needed to Address Mounting Challenges (GAO-02-292)." The Office of Management and Budget finds the draft report to have significant implications for the Office of Management and Budget's (OMB) role in overseeing agency implementation of the Paperwork Reduction Act, and for the Office of Information and Regulatory Affairs (OIRA).

The draft report focuses much of its attention to the finding that OIRA has not provided the agencies with a governmentwide strategic plan for information resources management (IRM), as required by the Paperwork Reduction Act (PRA). The report further finds the statement by OIRA officials that taken together, several documents address the requirements of the PRA, to be insufficient. OMB recognizes that the draft report evaluates OMB's compliance based on the goals of the PRA – that Federal agencies should have a comprehensive set of goals and measures by which to base agency performance in the areas of information collection, information dissemination, information technology oversight, security, privacy, records management, and statistical policy.

OMB is concerned that this report narrowly focuses on the finding that a governmentwide strategic Information Resources Management (IRM) plan must be a single document. The report's discussion of a single comprehensive plan does not reflect the fact that OMB's authorities in several areas, including information technology reform, e-government, and security, are derived from statutes in addition to the PRA. OMB directed GAO to the documents listed in this draft report as a means of demonstrating how OMB oversees and addresses policy in each of the IRM areas, and GAO has reflected this listing in its report. While these documents and reports are not fully integrated in a single document, taken together they set general standards and strategic direction across the government in all of the areas required by the PRA. As the report acknowledges, much of this strategic direction can be found in the discussion of IRM oversight contained in the President's FY 2003 Budget and in Chapter 22 of the Analytical Perspectives document. We will assess the value of better linking these documents together on OMB's web site; however, we question whether devoting OMB's scarce resources to integrating these documents under a single cover will indeed lead to improved agency performance in IRM.

Moreover, while the draft report acknowledges the role of OMB's Associate Director for IT and e-Government, it does not incorporate the importance of this office into its findings or analysis. Mark Forman, in his role as Associate Director, assists by providing strategic direction to agencies in many of the PRA related areas including information security, privacy, IT oversight, records management, and information dissemination, and leads the work of OIRA and other OMB offices to improve agency performance on these critical issues. While the draft report outlines several potential risks to government IRM that GAO notes as consequences of not having a comprehensive plan, OMB believes that Mr. Forman's leadership of the Administration's "Expanding E-Government" initiative, including his work with interagency groups such as the President's Management Council and the Chief Information Officer's Council, will address these potential risks.

OMB commends GAO's effort to gauge OIRA's activities in fulfilling our PRA authorities and other statutory responsibilities. However, the report does not analyze the impact of this Administration's policies and practices to fulfill our duties under the PRA and other relevant IRM statutes in a way that will lead to performance improvements in and across agencies. We believe that such an analysis would demonstrate that the President's e-Government initiative, and OMB leadership of strategic plans for agency work in the key areas of IRM oversight, are highly effective in carrying out the purposes of the PRA.

Specifically, OMB and OIRA's fulfillment of our responsibilities under the PRA lies in our oversight of agency efforts to meet the requirements of the Act. The reports and documents that are outlined in GAO's report represent the tools by which we conduct that oversight and the means by which we establish an expectation of general performance improvement across the government. Whether this is done through many mechanisms or a single mechanism does not detract from our efforts to fulfill the requirements of the Act.

Thank you again for the opportunity to comment. OMB looks forward to continuing work with GAO on how best to oversee agency work in this critical area.

Sincerely,



Mitchell E. Daniels, Jr.
Director

Related GAO Products

Bioterrorism: The Centers for Disease Control and Prevention's Role in Public Health Protection ([GAO-02-235T](#), November 15, 2001)

Computer Security: Improvements Needed to Reduce Risk to Critical Federal Operations and Assets ([GAO-02-231T](#), November 9, 2001)

Homeland Security: Challenges and Strategies in Addressing Short- and Long-Term National Needs ([GAO-02-160T](#), November 7, 2001)

Electronic Government: Better Information Needed on Agencies' Implementation of the Government Paperwork Elimination Act ([GAO-01-1100](#), September 28, 2001)

Homeland Security: A Framework for Addressing the Nation's Efforts ([GAO-01-1158T](#), September 21, 2001)

Combating Terrorism: Selected Challenges and Related Recommendations ([GAO-01-822](#), September 20, 2001)

Electronic Government: Challenges Must Be Addressed With Effective Leadership and Management ([GAO-01-959T](#), July 11, 2001)

Information Management: Dissemination of Technical Reports ([GAO-01-490](#), May 18, 2001)

Internet Privacy: Implementation of Federal Guidance for Agency Use of "Cookies" ([GAO-01-424](#), April 27, 2001)

Paperwork Reduction Act: Burden Estimates Continue to Increase ([GAO-01-648T](#), April 24, 2001)

Record Linkage and Privacy: Issues in Creating New Federal Research and Statistical Information ([GAO-01-126SP](#), April 2001)

Information Management: Electronic Dissemination of Government Publications ([GAO-01-428](#), March 30, 2001)

Combating Terrorism: Comments on Counterterrorism Leadership and National Strategy ([GAO-01-556T](#), March 21, 2001)

Information Management: Progress in Implementing the 1996 Electronic Freedom of Information Act Amendments ([GAO-01-378](#), March 16, 2001)

High-Risk Series: An Update ([GAO-01-263](#), January 2001)

Major Management Challenges and Program Risks: A Governmentwide Perspective ([GAO-01-241](#), January 2001)

Determining Performance and Accountability Challenges and High Risks ([GAO-01-159SP](#), November 2000)

Electronic Government: Opportunities and Challenges Facing the FirstGov Web Gateway ([GAO-01-87T](#), October 2, 2000)

Federal Chief Information Officer: Leadership Needed to Confront Serious Challenges and Emerging Issues ([GAO/T-AIMD-00-316](#), September 12, 2000)

Year 2000 Computing Challenge: Lessons Learned Can Be Applied to Other Management Challenges ([GAO/AIMD-00-290](#), September 12, 2000)

Internet Privacy: Agencies' Efforts to Implement OMB's Privacy Policy ([GAO/GGD-00-191](#), September 5, 2000)

Congressional Oversight: Challenges for the 21st Century ([GAO/T-OCG-00-11](#), July 20, 2000)

Revisions to OMB's Circular A-130 ([GAO/AIMD-00-183R](#), May 23, 2000)

Paperwork Reduction Act: Burden Increases at IRS and Other Agencies ([GAO/T-GGD-00-114](#), April 12, 2000)

Office of Management and Budget: Future Challenges to Management ([GAO/T-GGD/AIMD-00-141](#), April 7, 2000)

Managing in the New Millennium: Shaping a More Efficient and Effective Government for the 21st Century ([GAO/T-OCG-00-9](#), March 29, 2000)

Year 2000 Computing Challenge: Federal Business Continuity and Contingency Plans and Day One Strategies ([GAO/T-AIMD-00-40](#), October 29, 1999)

Managing for Results: Answers to Hearing Questions on Quality Management ([GAO/GGD-99-181R](#), September 10, 1999)

National Archives: Preserving Electronic Records in an Era of Rapidly Changing Technology ([GAO/GGD-99-94](#), July 19, 1999)

Paperwork Reduction Act: Burden Increases and Unauthorized Information Collections ([GAO/T-GGD-99-78](#), April 15, 1999)

Government Management: Observations on OMB's Management Leadership Efforts ([GAO/T-GGD/AIMD-99-65](#), February 4, 1999)

Information Security: Serious Weaknesses Place Critical Federal Operations and Assets at Risk ([GAO/AIMD-98-92](#), September 23, 1998)

Regulatory Management: Implementation of Selected OMB Responsibilities Under the Paperwork Reduction Act ([GAO/GGD-98-120](#), July 9, 1998)

Government Management: Observations on OMB's Management Leadership Efforts ([GAO/T-GGD/AIMD-98-148](#), May 12, 1998)

Statistical Agencies: Proposed Consolidation and Data Sharing Legislation ([GAO/T-GGD-98-91](#), March 26, 1998)

Managing for Results: Observations on Agencies' Strategic Plans ([GAO/T-GGD-98-66](#), February 12, 1998)

Managing for Results: Agencies' Annual Performance Plans Can Help Address Strategic Planning Challenges ([GAO/GGD-98-44](#), January 30, 1998)

Managing for Results: Observations on OMB's September 1997 Strategic Plan ([GAO/T-AIMD/GGD-98-10](#), October 6, 1997)

Agencies' Strategic Plans Under GPRA: Key Questions to Facilitate Congressional Review ([GAO/GGD-10.1.16](#), May 1997)

Statistical Agencies: Consolidation and Quality Issues ([GAO/T-GGD-97-78](#), April 9, 1997)

Managing for Results: Enhancing the Usefulness of GPRA Consultations Between the Executive Branch and Congress ([GAO/T-GGD-97-56](#), March 10, 1997)

Information Technology Investment: Agencies Can Improve Performance, Reduce Costs, and Minimize Risks ([GAO/AIMD-96-64](#), September 30, 1996)

Information Management Reform: Effective Implementation Is Essential for Improving Federal Performance ([GAO/T-AIMD-96-132](#), July 17, 1996)

Statistical Agencies: Statutory Requirements Affecting Government Policies and Programs ([GAO/GGD-96-106](#), July 17, 1996)

Federal Statistics: Principal Statistical Agencies' Missions and Funding ([GAO/GGD-96-107](#), July 1, 1996)

Executive Guide: Effectively Implementing the Government Performance and Results Act ([GAO/GGD-96-118](#), June 1996)

Executive Guide: Improving Mission Performance Through Strategic Information Management and Technology ([GAO/AIMD-94-115](#), May 1994)

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