
Forms Management Procedure

Directive No: CIO 2103-P-01.1

*Issued by the EPA Chief Information Officer,
Pursuant to Delegation 1-19, dated 07/07/2005*

Forms Management Procedure

1. PURPOSE

This Procedure establishes responsibilities and procedures concerning the process of Agency forms approval and management, regardless of format.

2. SCOPE

This Procedure addresses all management processes for internal administrative use forms and external public use forms. These Procedures apply to all Environmental Protection Agency (EPA) Programs, Regions, Labs and Offices.

3. AUDIENCE

The audience for this Procedure includes all EPA Programs, Regions, Labs and Offices.

4. BACKGROUND

The Code of Federal Regulation (41 CFR Section 102-193.20) establishes that the head of each Federal agency must assign specific responsibility for development and implementation for records management, including forms, and issue a directive establishing program objectives, responsibilities, authorities, standards and guidelines. In addition, the CFR advises agencies to not create forms that collect information inefficiently or unnecessarily, and states that agencies should review all existing forms periodically to determine if they can be improved or canceled.

In accordance with 41 CFR Section 102-193.20, the objective of the Forms Management Program is to achieve economic and efficient use of forms in the collection, analysis, storage, retrieval and dissemination of information. In achieving this objective, the forms management program promotes and controls the use of forms designed to:

- a. Standardize procedures
- b. Streamline approval process
- c. Standardize data collection and display
- d. Ensure that all internal and external forms are approved
- e. Maintain a centralized and complete inventory of all active EPA forms
- f. Minimize burden

[The 21st Century Integrated Digital Experiences Act \(21C IDEA\)](#) aims to improve the digital experience for government customers and reinforces existing requirements for federally produced digital products. Specifically, the Act requires that all Executive level agencies:

- a. Modernize websites and digital services
 - b. Move forms to digital platforms and services
 - c. Accelerate use of eSignatures
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- d. Improve user experience and service delivery
- e. Standardize and transition to shared services

The Agency Forms Management Program requires responsible officials to:

- a. Establish and implement standards and procedures for the submission, review, approval and identification of Agency forms.
- b. Ensure that all EPA forms are approved prior to use and included in an EPA forms inventory.
- c. Establish and implement standards for the formats in which forms are made available, electronically and physically, as well as appropriate distribution methods.
- d. Gather essential management information concerning the number, types, formats, and distribution methods used for forms in use.
- e. Provide for the periodic review of all approved forms for need and design and for possible economies in development, reproduction and distribution.

5. AUTHORITY

- a. [The Code of Federal Regulation \(41 C.F.R. Section 102-193.20\)](#)
- b. [21st Century Integrated Digital Experiences Act \(21 C IDEA\)](#)

6. PROCEDURE

- a. Form Approval Procedures
 - 1. There are set procedures concerning forms development and approval. All official forms are to be approved prior to use. Once approved, forms should not be modified without going through the approval process again unless provided a waiver by the appropriate Forms Officer.
 - 2. To initiate the process of developing and revising an internal or external form or renewing the approval of an external form, Form Owners should contact the appropriate Forms Officer well in advance of the time that the form needs to be used.
 - 3. Guidance and a form number will be provided once the Form Action Request with all appropriate information and signatures has been received.
 - 4. The Form Owner then develops and/or updates the form in accordance with the Forms compliance criteria unless the appropriate Forms Officer waives the requirement.
 - 5. Once the form is complete, it is submitted to the appropriate Forms Liaison in each EPA Region or Program Office. The Forms Liaison will then submit it to the appropriate Forms Officer for final approval. A form should adhere to the compliance criteria unless the appropriate Forms Officer waives the requirement. Once approval has been provided and form number has been assigned, then the forms may be distributed.
 - 6. Approved forms should be made available in suitable formats and distributed using appropriate methods. All forms should receive approval from the appropriate Forms Officer before being distributed. The appropriate Forms Officer may be contacted for further information.

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7. When a form is no longer in use and has become obsolete, the appropriate Forms Officer should be informed.
- b. Internal Form Approval Procedures
The requesting office submits a completed Form Action Request with the new and/or updated form to their Forms Liaison for approval before it is submitted to the appropriate Forms Officer.
- c. External Form Approval Procedures
 1. The requesting office submits a completed Form Action Request with the new and/or updated form to their Forms Liaison for approval before it is submitted to the appropriate Forms Officer.
 2. The Form Owner develops and/or updates their form according to the requirements provided by the Forms Management Program and through Office of Management and Budget (OMB) guidance.
 3. The Form Owner submits their completed form to the Forms Management Program at the same time that they submit their Information Collection Request (ICR) package.
 4. For forms that are subject to the Paperwork Reduction Act (PRA), EPA must comply with applicable PRA requirements regarding display of the OMB control number and expiration date and the PRA Burden Statement.
 5. Forms may not be used unless the related ICR has current OMB approval and the OMB control number is properly displayed. Forms that are subject to the PRA and have not been approved by OMB, have expired, or have been discontinued may not be used and must be removed from all distribution channels.
 6. Changes to the form may require the Form Owner to file an ICR or a Non-Substantive Change Request with the ICR Program and receive approval from OMB. Contact your ICR Desk Officer to confirm whether an ICR or Non-Substantive Change Request will be necessary.
 7. The External Forms Officer will review and approve external public use forms based on consistency with compliance criteria.
- d. Privacy Act
Under the Privacy Act of 1974 (PL-93-579), all forms which request a Social Security Number or other personally identifiable information (PII) from an individual must contain a Privacy Act Statement (PAS) with the following information:
 1. A statement as to whether the disclosure is mandatory or voluntary
 2. The statutory or other authority under which the information is requested
 3. Intended uses of the information (purpose)
 4. What effects, if any, of not providing the information
 5. How information collected will be disclosed (routine uses)
 6. Whether the individual has the opportunity to decline to give the information or consent to its particular uses
- e. Section 508 Compliance
- f. Section 508 of the Rehabilitation Act, as amended (29 U.S.C. § 794d), mandates the development, procurement, maintenance, and use of ICT that is accessible to people with disabilities, both federal employees and members of the public. Forms owners should ensure access for people with disabilities, including motor, auditory, cognitive, seizure/neurological, and visual impairments. Official forms content must be “perceivable, operable, understandable, and robust” to persons with disabilities and assistive technology users.

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- g. **Development**

The Forms Management Program has provided forms development guidance and compliance criteria for internal and external forms to encourage the adherence to EPA's applicable information directives.
- h. **Electronic Signature**
- i. For external forms, the Office of Mission Support (OMS) has provided the legal framework for electronic signatures on forms submitted under any part of Title 40 of the Code of Federal Regulations (CFR) by promulgating the Cross-Media Electronic Reporting Rule (CROMERR), finalized as 40 CFR part 3. CROMERR was published as a final rule on October 13, 2005, and specifically provides for electronic signatures in sections 3.4, 3.10, 3.2000(a), 3.2000(b)(5), and 3.2000(c). Both internal and external forms must adhere to EPA Electronic Signature Policy and EPA Electronic Signature Procedure.
- j. **Locating Forms**

Making forms readily available to affected parties is the responsibility of the Forms Management Program. Forms Owners must coordinate with their Forms Liaison to ensure that the most current versions of their forms are reflected in the agency's Forms Inventory.
- k. **Physical Availability to Forms**

It is the responsibility of forms owners to maintain an accessible method of completing digital services through in-person, paper-based, or other means, such that individuals without the ability to use digital services are not deprived of or impeded in access to those digital services. Examples of alternate means of access are submitting the form's information via an in-person interaction at a customer service center, calling a hotline, or having the ability to request a hardcopy of a form.
- l. **Printing Forms**

In accordance with Title 44, any reproduction of EPA forms for stocking and distribution purposes by the Agency need to be routed through Headquarters Services Branch (HSB) in OMS' Facilities Management and Security Division. All form print requests should receive signed approval from the appropriate Forms Officer.

7. ROLES AND RESPONSIBILITIES

- a. Responsibility for the development and implementation of the EPA Forms Management Program is assigned to the Office of Mission Support's (OMS') Office of Enterprise Information Programs (OEIP). Two Forms Officers manage the Agency forms process; an Internal Forms Officer and an External Forms Officer.
- b. All Assistant Administrators, the General Counsel, the Inspector General, Associate Administrators, Heads of Staff Offices and Regional Administrators provide for implementation of the Forms Management Program in their respective areas. They should:
 - 1. Assure that the provisions of this document are carried out within their respective areas of jurisdiction.
 - 2. Designate individuals within their respective areas to act as Forms Liaisons.
- c. As the Agency's Forms Management Program, OMS shall:
 - 1. Provide technical guidance to Form Owners and designated Forms Liaisons.

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2. Inform Form Owners that they must obtain clearance on all forms that fall under the Privacy Act of 1974, as described in paragraph e.
 3. Provide guidance on the development, reproduction, distribution and availability of all forms.
 4. Maintain an inventory of all approved Agency wide forms.
 5. Maintain a numbering system for forms and track all forms through a Forms Register.
 6. Approve and provide guidance for Agency wide forms.
- d. Forms Liaisons in regional and program offices coordinate forms and their management activities within their respective organizations.
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8. RELATED INFORMATION

- a. [Cross-Media Electronic Reporting \(CROMERR\)](#)
 - b. [Digital Government Strategy](#)
 - c. [E-Enterprise Digital Strategy](#)
 - d. [E-Government Act of 2002](#)
 - e. [Enterprise Information Management \(EIM\) Cataloging Information Procedure](#)
 - f. [Enterprise Information Management \(EIM\) Minimum Metadata Standards](#)
 - g. [Enterprise Data Management Policy](#)
 - h. [EPA Information Collection Policy](#)
 - i. [EPA Privacy Policy](#)
 - j. [EPA Policy for Forms Management](#)
 - k. [Section 508 Policy](#)
 - l. [Government Paperwork Elimination Act of 1998](#)
 - m. [H.R. 1079 – Creating Advanced Streamlined Electronic Services for Constituents Act of 2019](#)
 - n. [H.R. 1770 – OPEN Government Data Act](#)
 - o. [H.R. 2331 – Connected Government Act](#)
 - p. [H.R. 4174 – Foundations for Evidence-Based Policymaking Act of 2018](#)
 - q. [H.R. 5215 – Confidential Information Protection and Statistical Efficiency Act of 2002](#)
 - r. [Implementation of the Government Paperwork Elimination Act](#)
 - s. [Plain Writing Act of 2010](#)
 - t. [S.244- Paperwork Reduction Act of 1995](#)
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9. DEFINITIONS

Information Directive: Written communication that initiates or governs actions, conduct, or procedures and is usually printed as circulars, notices, regulations, orders and handbooks, and includes material for the insertion of policy, administrative and operation manuals.

EPA Form: A form originated within EPA, approved and ready for use.

External Form: A form that is used by EPA to collect information from the public. These forms should be approved by the External Forms Officer prior to use. When these forms

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are intended to collect information from ten or more public respondents on identical items, these forms must also be approved by OMB.

Form: A form contains a fixed arrangement of captioned spaces designed for entering and extracting prescribed information.

Forms Liaison: Forms Liaisons coordinate forms management activities within their respective offices or Regions.

Forms Officer: Forms Officers are responsible for the development and implementation of the EPA Forms Management Program. The Internal Forms Officer will manage the program for internal forms. The External Forms Officer will manage the program for external forms.

Form Owner: Any individual who is updating or developing a form for internal or external use.

Information Collection Request (ICR): An ICR is a set of documents that describe reporting, record keeping, survey, or other information collection activities involving the public that EPA plans to (continue to) conduct or sponsor. As a general rule, ICRs are required for external public use forms intended to collect information from ten or more public respondents on identical items. Each request to collect information that is subject to the Paperwork Reduction Act (PRA) must be sent to and approved by the OMB before a collection begins. Among other things, the ICR provides an overview of the collection, and estimates the cost and time for the public to respond.

Internal Form: A form originated within EPA for Agency wide use. This type of form should be approved by the Internal Forms Officer prior to use.

Personally Identifiable Information (PII): Any information that can be used to distinguish or trace an individual's identity either alone, such as their name, social security number, biometric records, etc., or when combined with other information that is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

10. WAIVERS

A form should be developed, revised and/or updated in accordance with the Forms design specifications unless the appropriate Forms Officer waives the requirement.

11. MATERIAL SUPERSEDED

Procedures for Forms Management - CIO 2103-P-01.0.

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12. CONTACTS

Please email EPA's Forms Management Program at forms@epa.gov with any questions about this document.

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and Chief Information Officer***
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