

Department of Transportation

Office of the Secretary

Washington, D.C.

ORDER

DOT 1323.3

6-10-74

SUBJECT: CLEARANCE OF INTERAGENCY REPORTS

1. PURPOSE. This order establishes Department of Transportation (DOT) policy; assigns responsibility; and describes the procedures to be followed and the documents to be prepared for obtaining approval to establish, modify or discontinue an interagency reporting requirement.
2. AUTHORITY.
 - a. Federal Records Act (44 U.S.C. Chapters 29 and 31).
 - b. Office of Management and Budget (OMB) Circular No. A-40, Revised, "Management of Federal Reporting Requirements", dated May 3, 1973.
 - c. Federal Property Management Regulations (FPMR), Subpart 101 - 11.11, "Interagency Reports Management".
3. POLICY. Each operating administration and Secretarial Office shall obtain clearance from the Assistant Secretary for Administration, OST, and the National Archives and Records Service, General Services Administration (NARS - GSA) before levying a reporting requirement on other departments and independent agencies of the Federal Government.
4. DEFINITIONS.
 - a. Report.
 - (1) Data, or information, which is transmitted for use in determining policy; in planning, controlling, and evaluating operations and performance; in making administrative determinations; and in preparing other reports. The data or information may be in narrative, statistical, graphic, or other form and may be transmitted by any method (e.g., form, memorandum, punched card, magnetic tape, telephone, etc.).
 - (2) Certain types of data or information commonly identified as "reports" are excluded from this definition. They are:
 - (a) Inspection and audit reports.
 - (b) Research, findings, technical summaries, and special management studies and surveys.

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- (c) Responses to requests for review and coordination.
- (d) Documents requiring security clearance.
- (e) Documents required in daily administrative operations such as those used in individual supply actions, individual procurement actions, and individual personnel actions.
- (f) Emergency situation reports; i.e., those reports of limited duration required to properly respond under conditions of natural disasters and crisis (domestic).

- b. Interagency Report. A report that is prepared by one or more departments or independent agencies for use by another department or independent agency.
- c. Reporting Requirement. Any requirement which calls for the preparation and transmission of a report.
- d. Requiring Organization. The operating administration or Secretarial Office that has authority to establish, revise, or cancel a reporting requirement.
- e. Responding Organization. The department, agency, or other organization that replies to a reporting requirement.
- f. DOT Interagency Reports Coordinator. That individual in the Office of Management Systems, Office of the Assistant Secretary for Administration, designated to serve in a liaison capacity with NARS on Department of Transportation interagency reporting matters. (Chief, Organization and Management Team II - TAD-232.)

5. RESPONSIBILITIES.

- a. The Assistant Secretary for Administration is responsible for assuring that all interagency reporting requirements proposed by the Department of Transportation are cleared with the Office of Records Management, National Archives and Records Service, General Services Administration.
- b. Secretarial Officers and heads of operating administrations are responsible for:
 - (1) Assuring that requirements of this directive are implemented in their organization.
 - (2) Designating an interagency reports coordinator to serve in a liaison capacity with the DOT Interagency Reports Coordinator on interagency reporting matters related to their organization.

6. PROCEDURES. A DOT operating administration or Secretarial Office which plans to initiate a new program or policy change which would require a new interagency reporting requirement or cause a major change to an existing one shall:
- a. Request in writing through the DOT Interagency Reports Coordinator, TAD-232, assistance from the Office of Records Management, National Archives and Records Service, NARS, in defining and assessing related interagency reporting requirements. Such requests shall be made at the earliest practical opportunity in the planning.
 - b. Prepare and submit through the DOT Interagency Reports Coordinator, at least 30 days prior to the proposed effective date, a formal request for clearance of the reporting requirement. The request must contain:
 - (1) SF 360, Request for Clearance of an Interagency Reporting Requirement (original and 3 copies). The DOT Interagency Reports Coordinator must sign Item 10 prior to consideration by NARS-GSA. Item 9 of SF 360, Summary of Estimated Reporting Costs, will be completed based on supporting documentation and worksheets which will be kept available for review in the requiring office. The three cost categories are described below:
 - (a) Developmental costs that result from establishing a new reporting requirement or modifying an existing reporting requirement include:
 - 1 Specification of requirement.
 - 2 Analysis of requirement.
 - 3 Design of reporting system.
 - 4 Installation of reporting system.
 - (b) Operational costs that result from those continuing activities in preparing and transmitting a report including:
 - 1 Data collection.
 - 2 Processing.
 - 3 Transmission.
 - (c) User costs that result from activities performed by the requiring office on transmittal information including:
 - 1 Refining, interpreting and analyzing information received.
 - 2 Reading, reviewing, discussing, and documenting, information (e.g., conducting briefing sessions, preparing

summary report, making data available through remote terminals, etc.).

(NOTE)

The methods by which costs are identified and estimated are stated in greater detail in "Guide to Estimating Reporting Costs" which was issued in June, 1973 by the National Archives and Records Service and which may be obtained from NARS.

- (2) Justification of Reporting Requirement (3 copies). This statement should justify the requirement in terms of its value to management. The costs of the requirement (i.e., developmental, operational, and user costs) should be evaluated and stated in terms of increased productivity, more timely service, better quality in output, reduced costs, etc.
 - (3) Proposed directive that will prescribe the reporting requirement (3 copies). The directive should include the following information about the requirement: purpose, title, format, preparation instructions, responding agencies, frequency of reporting, number of copies each responding agency is to submit, routing, due date, action to be taken by responding agency if its report is negative, approval number issued by NARS (if any), and the title and address of the official in the requiring agency to whom the report is to be sent.
 - (4) Copy of the report if the report is not new (3 copies).
- c. Conduct a sampling of responding agencies to provide a basis for estimating reporting costs and validating the method of data collection. The result of this sampling should be submitted with the report.
 - d. If the reporting requirement necessitates development of a major information system, develop plans for pilot testing the system prior to its full implementation. A copy of the plan should be submitted with the clearance request.

7. WAIVER OF REPORTING REQUIREMENT JUSTIFICATION.

- a. When it is believed that it would be in the interest of the Government not to submit the justification prescribed in paragraph 6b(2) above, a waiver may be requested by submitting the following to the Interagency Reports Coordinator, TAD-232, for forwarding to NARS-GSA:
 - (1) A letter explaining the compelling reason(s) for the waiver request.
 - (2) An SF 360 with all items except Item 9 filled in.
- b. The request will normally be answered within two weeks of its receipt. If the waiver is denied, justification and documentation cited in paragraph 6b(2) must be prepared and submitted.

8. EXEMPTIONS. The following interagency reporting requirements are exempted from the clearance requirements. However, interagency reporting requirements that may be developed to respond to an exempted requirement are subject to the clearance provisions of this directive (e.g., a Presidential requirement for information which necessitates the obtaining of data from other departments or independent agencies).
 - a. Legislative branch requirements in statutes or Congressional committee requests.
 - b. Judicial branch requirements in court orders or other judicial determinations.
 - c. Presidential requirements in Presidential directives.
 - d. OMB budgetary, program review and coordination, and legislative clearance requirements.
9. INTERAGENCY PUBLIC REPORTS. Whenever an interagency reporting requirement requires approval by the Office of Management and Budget because the information to be collected is to be used for statistical compilations of general public interest or necessitates collection of information by the responding agencies, NARS must review the proposal before consideration by OMB.
10. EXPIRATION DATES AND EXTENSIONS. Each approved reporting requirement will be assigned an expiration date by NARS. This date is contingent upon the particular reporting requirement, but usually it will be three years from the date of approval. If the requiring DOT organization desires to use the report beyond the scheduled expiration date it must apply for an extension by submitting the documentation prescribed by paragraph 6b above.
11. DISCONTINUANCE OF AN INTERAGENCY REPORT. Whenever a requiring office no longer requires a report it should prepare a written notification of discontinuance and forward it to all responding agencies and the DOT Interagency Reports Coordinator. The reasons for discontinuance should be stated in the notification.
12. APPEAL PROCEDURES. If any DOT element that is either a requiring organization or a responding organization questions a decision by NARS on an interagency clearance or waiver request, it should consult with the DOT Interagency Reports Coordinator and jointly decide the most appropriate appeal action to take.
13. ACTION REQUIRED. Secretarial Officers and heads of operating administrations shall:
 - a. Within ten days of receipt of this directive submit in writing to TAD-232 the name of the individual designated as interagency reports coordinator.

- b. Publish instructions implementing this directive within their organization.

FOR THE SECRETARY OF TRANSPORTATION:



William S. Heffelfinger
Assistant Secretary
Administration