

Comment from Senior Fellow Nina Olson on *Identifying and Reducing Burdens in Administrative Processes*
November 6, 2023

1. On page 3, lines 38 to 40, I suggest we include the establishment of ombuds offices as one of the important numerous strategies that can reduce burdens. “Agencies employ numerous strategies to reduce those burdens, including simplifying processes, improving language access, and expanding the availability of online (instead of solely in-person) processes, and establishing ombuds offices to assist those experiencing burdens.” You could then drop a footnote to the ACUS recommendation on establishing federal agency ombuds offices.
2. Page 6, line 90, item (d) – I suggest adding the language “including agency ombuds or public advocate staff.”
3. Page 8, line 156, I suggest amending as follows: “Agencies should include their General Counsels, ombuds and Public Advocates, and other internal stakeholders”
4. Page 8, line 162, I suggest adding “within the confines of law” or “unless law or policy dictate otherwise” to the end of this sentence. In some cases, broad sharing of data will undermine public confidence in the agency holding the data – the lessening of confidentiality/privacy protections could reduce the accuracy of data being reported to the agency by the public (eg self assessment on tax returns). Further, there needs to be explicit restrictions on the use of shared data – so that data developed for one purpose is not used for another purpose in which it will have negative and harmful results for members of the public. See the Robodebt scandal in Australia and the SyRI case in The Netherlands.