

Comment from Liaison Representative Tobias Dorsey on *Identifying and Reducing Burdens in Administrative Processes*  
October 16, 2023

The recommendation in a number of places uses a relative standard rather than an objective one. For example, paragraph 12 (line 55) says agencies should make information about their programs “easier” to find and understand; paragraph 14 (line 62) says agencies should “increase” the availability of assistance; paragraph 19 (line 89) says agencies should “expand” efforts. I don’t love this kind of relative language because it doesn’t create a meaningful yardstick for measuring agency performance; it simply tells each agency to use its own current practices as the baseline and try to do better than the baseline. Agencies that are already performing at the A+ level are told they need to do better, and agencies that are performing at the D- level are likewise told they need to do better—and given the permanent quality of the recommendation, in both cases they seemingly have to do it perpetually—make it easier, and easier, and easier, and easier, ad infinitum. I think instead agencies should be given a fixed, timeless, objective standard (even though it might be vague). For example, we tell agencies to use “plain” language; we don’t tell them to use “plainer and plainer and plainer” language. I realize my comment here also strikes at the basic thrust of the recommendation—paragraph 1, line 2, agencies should “reduce” burdens. I suggest there must be a point at which an acceptable level of burden has been achieved. What is that level?

As a related issue—perhaps this is a second comment—I would like the recommendation to be more clear about whether it is intended to be a one-time sprint (“reduce as much as you can over the next X years”) or a perpetual responsibility institutionalized within the agency. If the former, I think “relative” language may be more tolerable. If the latter, it begs the question—what guidance, if any, do we want to provide to agencies on how they should accomplish this?

Toby