

AN ABSTRACT OF THE THESIS OF

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Abstract approved: \_\_\_\_\_

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Information is a unique resource, unlike any other resource previously addressed by the Federal government policymaking process. As presented in professional literature, information can be described as expandable, substitutable, transportable, shareable and diffusive (Cleveland 1982, 1985). The apparent failure of the Federal level policymakers to grasp the distinctions between information resources and the produced goods of the industrial economy is examined through literature investigation and a case study analysis. Both the literature and the case study suggest that neither the Federal level policymaking processes nor the created policies are relevant to today's information-rich environment. Sociopolitical and economic realities of today are defined by information resources and information technologies. The characteristics of information combined with the speed of available information technologies, combine to produce a resource environment which is nonlinear, holographic and indeterminate, where complex, open systems create resources not easily valued by traditional economic methods. The institutionalized processes by which the Federal government produces policy, however, are still rooted in the linear, cause-effect, mechanistic metaphor of the industrial age. Weaknesses in the present system need to be exposed and remedial measures begun through the use of modeling and further research in the field of Federal information policy study. Case study application of Levitan's exploratory model offers preliminary delineation of Federal policymaking process components and discussion of theoretical misconceptions which require further investigation.

CASE STUDY OF  
FEDERAL INFORMATION POLICYMAKING PROCESS  
USING PRELIMINARY APPLICATION  
OF AN EXPLORATORY MODEL  
TO THE PAPERWORK REDUCTION ACT OF 1980

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## CHAPTER 1

### INTRODUCTION

#### **Policymaking Questions and Problems**

Impetus for the study of information policy and policymaking arises from the apparent failure of existing policy, governing goods and services, to address the unique milieu of information. (Braman 1989a, 1989b, 1990, in press), (Cleveland 1985), (Hernon 1989), (McClure 1989). Accepting Braman's definition of information policy as "that which has the effect of determining how society is constituted through controls placed on information creation, flows, and use" (1988, 10); the mega-question concerns the procedures used by policymakers. Are policymaking processes relevant to society's present needs and conditions? Are the outcomes of those procedures, the created policies, relevant and realistic for society's needs and conditions? The literature explored suggests both answers are negative but corrective information is lacking. Exploration of both problems is needed, with the expectation that weak areas will be manifested and reasonable solutions set in motion.

The purpose of this study is the preliminary application of an exploratory model to the Federal information policymaking process. The specific hypothesis of

the study is that application of an exploratory model to a specific instance of policy creation will delineate, in an organized format, the components of the present policymaking system at the Federal level. The operative question is whether or not identifiable correspondence between the components of the model and the documented process will be revealed in the application of the exploratory model. Secondary anticipated benefits of the investigation include obtaining evidence of criteria by which to identify entities in the policymaking process at the Federal level and that the use of an exploratory model will expose interrelationships among the components of the Federal policymaking system.

### **Policymaking Issues**

In the context of the Federal level of the United States government, it is not unusual to think of the three branches of government as being engaged in the policymaking process. Federal level policy is evidenced in public law, regulations, court decisions (Braman 1988a, 1988b, 1989a, 1990, in press) and agency directives. Hernon distinguishes Federal information policy as that which "governs practices of an agency or branch of government or has government-wide implications" and "has [the] force of law" (1986a, 231). This is the most visible level of Federal government information policy and policymaking. It encompasses the



diverse agencies which are under the jurisdiction of the Federal government.

However, each branch and agency is a contained bureaucracy with specified jurisdiction, decision making hierarchy, and procedural protocols. This is a less obvious but deeply entrenched level of policy -- expressed in the hierarchies, jurisdictions, and protocols -- governing policymaking. Both are static, linear systems, ingrained in culture and practice. Federal level policymaking depends upon and impinges upon information utilized in and by all agencies separately, as well as other entities which represent agencies and combine functions of the agencies: GPO, OMB, GOA, OTA, NTIS, JCP, as examples.

In the past, the policies were understood by both population and policymakers to govern the production of goods and services in the industrial and post industrial environment. However, the subtle and cumulative shift into an "information-intensive society" (Braman in press) has produced a degree and type of change that renders the governing policies of previous eras impotent. Braman captures the essence of the shift. "The quantitative change [the amount of our dependence upon information and information technologies used for delivery] has yielded a qualitative change" (Braman 1988b, 2). The focus of society has shifted. Sociopolitical and economic realities are

defined by the information capabilities of individuals and groups.

Unfortunately, the tools of governance, the institutionalized processes by which the primary resources of a geopolitical entity are produced, managed, and distributed, are rooted in the mechanistic metaphor of the industrial age. The shoe no longer fits. Policy which adequately covered the simple cause-effect relationships of production and service provision is woefully inadequate to address the needs of the information-rich environment. Previously workable assumptions about goods and services and the policy required to manage them have collided with information as a resource entity and with information technology.

Two descriptions of information provide clues to the fundamental problem. Machlup (1980, 7) defines information as "anything that is known by somebody". Krippendorff (1984, 5) characterizes information as "a property of pattern, not of matter". Information does not fit institutionalized policymaking process because of this elusive nature. Unlike agricultural products, manufactured goods, or fast food, information cannot be easily quantified, measured, timed, or valued by any traditional means. It is, according to Cleveland, (1982, 1985) expandable, substitutable, transportable, shareable, and diffusive; characteristics

quite disparate from those assigned to apples, coats, machines, and burgers.

Additionally, an evident paradox of the information driven society is that the infrastructure charged with making policy to manage information resources requires the information being managed as the life blood of the policymaking system. The constant change in the information society's resources and technologies places the policymakers using institutionalized policymaking procedures at a distinct disadvantage. The policymaking bodies are charged to utilize a present system, rooted in assumptions applicable to the past, to chart a future direction.

The issue of information policy formulation is further clouded by several problems. Terminology in the field of information management is still crystallizing. Information overlaps several disciplines as both raw material and created resource. Rules and values suggested for dominant standards in information policy are as diverse as the definitions. No available criteria are available by which to evaluate information policy at the national level and national goals are lacking as well. The evolving terminology, content boundaries, values, criteria, etc., create confusion among the various stakeholding agencies and individuals charged with policymaking.

The consequences of policymakers' faulty assumptions "result in the building of legal fictions into the

information regulatory environment" (Braman 1990, 56), producing problems across broad integrated areas of practical function. Government information also contains cross-disciplinary tenets, diverse stakeholder groups, and multiple possible interactions and relationships. This environment hatches large theoretical problem-issues which are raised without a productive, cohesive base of understanding from which to offer solutions. Why, then, do policymakers insist upon using the reified mold of institutionalized policy and policymaking for goods and services in attempts to create and guide information policy?

Policymaking stakeholders require education regarding the nature of information as a resource, including the characteristics which render traditional policy inappropriate and even detrimental. Key objectives of the educational process include delineation of vocabulary, identification of stakeholder groups, and clarification of the processes involved in policymaking action. An additional benefit would be the opportunity to inform policymakers and effect some measure of change during the educational process.

### **The Exploratory Model**

Throughout the Federal government's policymaking process, evidence of the prevailing political ideologies, interaction among various players and agencies, and

interrelationships among groups actions, technologies, etc. emerges in documentation of stakeholder contribution, debate, and action. By organized analysis of the documented processes, some of the educational objectives can be met, making past action more useful for charting future direction.

McClure advocates the use of modeling to identify and/or visualize the interconnecting components of a system. The operational definition of a model as a "simplified view of complex phenomena" (McClure 1989, 278) allows different forms to serve several purposes, all directed toward better understanding of the Federal information policy and the policymaking system. Based on accepted definitions for exploratory, descriptive, and predictive models (McClure 1989, 278-281), the greatest need appears to be for exploratory models to provide the information and benefits of exploratory research. Possible benefits, cited by McClure (1989) include the following:

- Make a "first cut" at identifying possible components, variables, or factors that, when considered together, might help to better explain the phenomenon under investigation
- Develop propositions or areas where further investigation might prove fruitful
- Assist in the development of descriptive or predictive models.

Levitan's graphic model, pictured in figure 1, offers a systemic translation of terminology introduced by the Information Industry Association.

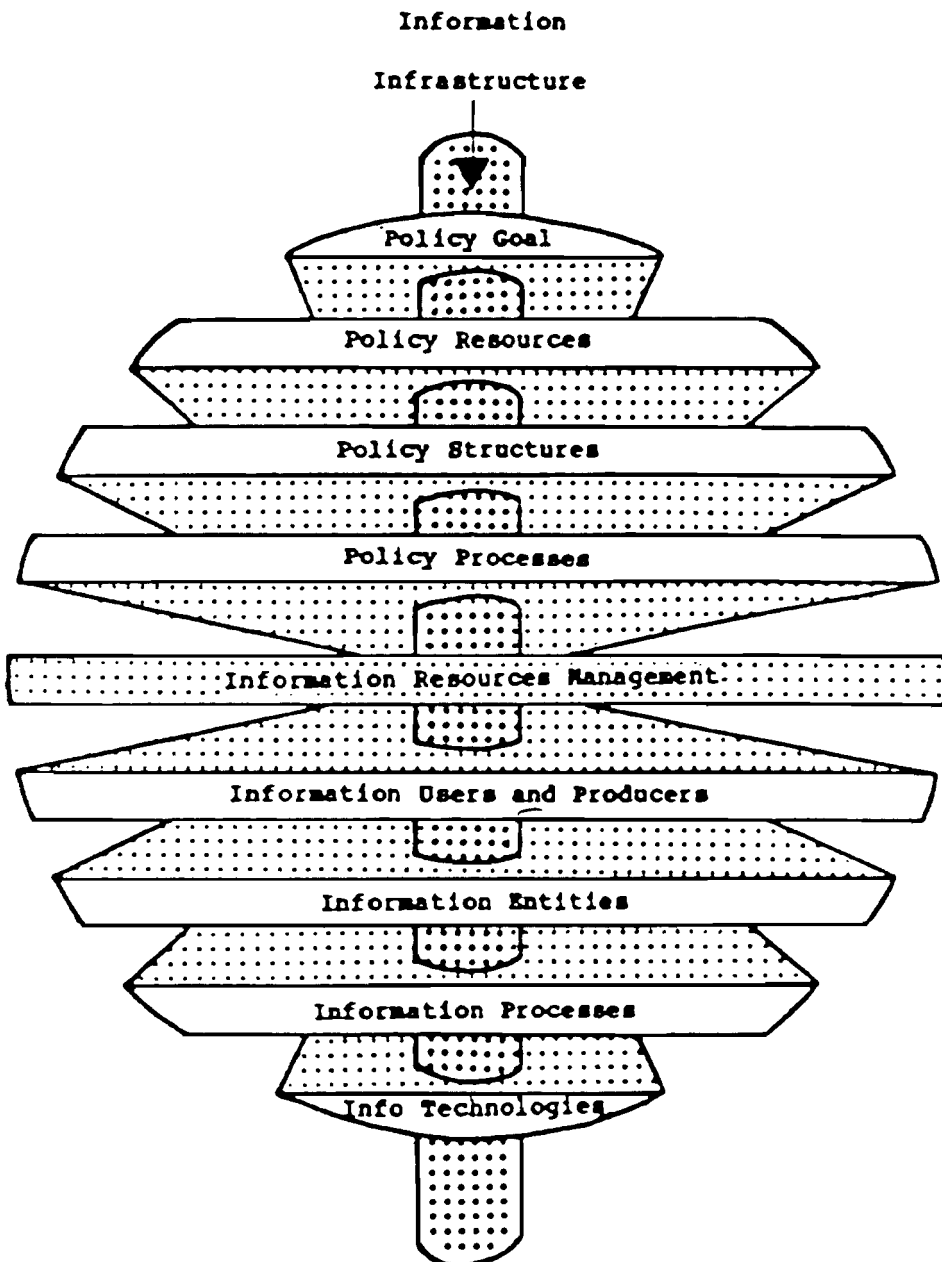


figure 1

The "information infrastructure" (Levitan 1987, xv), (or the "infostructure" as named by the Information Industry Association) is viewed as that which supports the decisions or policymaking processes in organizations. The structure, however, should not be interpreted to be static. Rather, it is composed of people; agencies, stakeholder groups, (formalized and ad hoc groupings) and information, taking on the characteristics and values of both people and information. An additional component is the technology by which information and information resources are transferred. Influencing all components are the stated goals of the governmental system, existing policy which controls the policymaking process, and available resources. Though the model is apropos for a variety of organizational applications, this study will focus on the policymaking process at the Federal level of government.

Levitan's premise for the model is that "if we are to improve how we make and execute policies, we need to understand the organizational and governing factors of related infostructures" (1987, xv). The elements of the infrastructure are viewed as consistent influences in the policymaking process, though not visible at all times. Like Braman (1989a), Levitan acknowledges the variable combinations of infrastructure elements which occur in response to specific policy contexts; regrouping of

stakeholders according to values, ethics, technologies, and special interests interacting with available policies, resources, and stated goals. However, each component may have its own purpose, agenda, and procedures and, at present, any realignment appears to occur purely by chance rather than shared design or purpose.

Levitan defines the model by suggesting that if we peeled open a section of a government agency, we would see various layers of a given policymaking system. . . , its goals; its legislative, administrative, judicial, and constituent structures; various policymaking processes from open forums to formal voting -- all supported by an underlying structure of information users, producers, entities, processes, and technologies that are managed as resources for policy purposes (1987, xvi)

Four categories evident in the description are people, resources, processes, and technologies.

Recalling that one purpose of graphic modeling is to render the complex in more simplified form, application of Levitan's model will begin the process of sorting the interrelationships and interactions among the various elements of the infrastructure as they respond in a specific policymaking situation. Though preliminary application of a case does not reveal all, the delineation of elements which



support the policymaking structure can move toward awareness of the subcurrents of the institutionalized policymaking processes. Specifically, Levitan's model will be used to categorize the available documentation relevant to the Paperwork Reduction Act of 1980. The usefulness of the model will be explored in terms of ease of application and the degree of clarification evidenced in the organization of processes and stakeholders, drawn from the legislative documentation and delineated through the model.

### **Genesis of Federal Information Policy**

In the United States, where a cohesive national information policy does not exist, research also has the potential to contribute to the establishment of goals, procedures, and policy statements. Tested frameworks for analysis are needed to decipher the interconnected relationships among various Federal level agencies, committees, and stakeholder groups. Finally, information policy issues and problems will become more complex as technological advances introduce additional untried relationships and control measures; multiplying the conflict and confusion. Therefore, the use of graphic models for information policy research offers options for analysis which are just beginning to be explored.

Manifest Federal government information policy is represented in this investigation, by The Paperwork

Reduction Act of 1980; also known as Public Law 96-511. The significance of the Paperwork Reduction Act of 1980 is two-fold. It represents both the legislative process and a watershed in the Federal government's attempt to manage government information. It is a Federal attempt to address information resources management through the legislative process designed to produce public law. The Paperwork Reduction Act can stand as representative of policy formulation at the Federal level on the basis of knowledge about the legislative process, the Constitutional role carried out by Congress. Public Law 96-511, from inception to codification, followed the same procedural steps as any other piece of legislation moving through Congress.

The genesis for the Federal level management of information occurred with the passage of the Printing Act of 1895. The intent of the Printing Act of 1895 was to remedy seventy-five years of inept handling of government printing (including inaccuracy, inefficiency, loss of documents, bribery and scandal) and solidify the Government Printing Office's role as official printer, binder, vendor, and distributor for the Federal government (Robinson 1988, 13). In addition, this Act provided the legal foundation for establishment of Title 44 of the United States Code.

In broad terms, Title 44 of the U.S. Code "requires [the] GPO to fulfill the printing and binding needs of the federal government and to distribute U.S. government

publications" (Robinson 1988, 13). Evolving and expanding information needs of the population and government elicited response in the form of multiple sections under the umbrella of Title 44; section 3, national publications; section 5, public printing services; section 7, distribution of government publications; section 9, printing and distribution services for Congress; section 11, government publications management; section 29, records, management; section 35, Federal information policy coordination.

In the intervening century since the passage of the Printing Act of 1895, the Federal government has enacted law, created study commissions and, in a disjointed fashion, responded to the needs of a societal evolution. Some notable pieces of the government's response include The Act of May 11, 1922, to legislate review of government periodicals (and which also flung the Office of Management and Budget into the Federal paper system); The Federal Reports Act of 1942, mandating paperwork clearance through the OMB; The Brooks Act (of 1965), which attempted to regulate Federal information technology; the establishment of the Commission on Federal Paperwork in 1974 and its subsequent report, delivered in 1977.

The practical origins of The Paperwork Reduction Act of 1980 as well as the philosophical foundation for government information resources management are found in the Commission's report. Three pertinent observations preview

the government's evolving stance on information. First, information should no longer be considered a "free good". Rather, the information collected by the government should be managed as any costly asset in the same way it manages "financial, material, physical, and human resources" (Sprehe 1987, 190). Second, the Commission noted an absence of any guideline for the efficient management of information resources. Third, the dispersed information collection and production activities should be consolidated and cohesively managed. Further, the Commission suggested that oversight could be best managed if consolidated to one unit for all planning, budgeting, and general assistance to all government agencies.

McClure et al. (1989) provides brief analysis of the position granted to the Office of Management and Budget by The Paperwork Reduction Act. Through the range of powers given to the OMB, he identifies the Act "as the single most important catalyst in shaping OMB's existing role in information policy" (McClure et al. 1989, 55). The Director of OMB also gained broad power, charged with "overseeing, planning for, and conduct of research with respect to Federal collection, processing, storage, transmission, and use of information" (McClure et al. 1989, 54).

Since its passage in 1980 and implementation via OMB Circular A-130, "The Management of Federal Information Resources", The Paperwork Reduction Act has generated

reaction and critique in professional literature. (Doty and Erdelez 1989), (McClure et al. 1989) (Caudle 1988), (Levitan 1987), (Bishop et al. 1989), (Plocher 1988), (Morehead 1988). Concerns expressed by those in information services and information science professions reflect the government's inability to legislate acceptable definitions of terms, valuing systems for information resources, or a consensual approach to information management. Key elements of dissatisfaction center on the concepts of free information, distribution versus dissemination, assigning value to information resources, and the issue of public access.

The Federal government has persisted in incorporating the "legal fiction" expressed by Braman, into the regulatory system, disregarding the inherent differences between the nature of information resources and the commodities of the industrial society. Hernon argues that the "OMB equates information resources management with reducing the volume of paperwork that Federal agencies create and collect" (1986, 281) Therefore, in the name of efficiency, access and dissemination are curtailed and bibliographic control is left to the devices of the various agencies, already charged to cut cost. Caudle observes a "organizational lack of understanding of the critical nature of information management as it has evolved into the 'Information Age'" (1988, 793). Professional observers share the belief that the government has moved from the position of free access

and free flow of information to a laissez faire attitude which favors privatization of information resource production and assigning value to information products as if they were comparable to soybeans.

Simply, the government's version of managing information resources is to control the physical elements of information technology and paper flow. The problems noted by the Commission and analyzed in professional literature delineate the conceptual lag between actual societal practice and the response of the institutionalized government with regard to the transition into an information economy.

## CHAPTER 2

### LITERATURE REVIEW

#### **Exploration of Terminology and Classification**

The policymaking milieu is described in existing literature using varied definitions and conceptual approaches. Even the most cursory investigation underscores the enmeshed histories of policy analysis and the analysis of the policymaking process. The multiple possible approaches to study, combined with varied perspectives and little distinction between policy analysis and analysis of the policymaking process, serve to muddy the waters further when the analysis is applied to the multifaceted system inherent in our Federal government. Clarification of this terminology coupled with a conceptual classification scheme will enhance understanding of the present study.

An individual author's approach to policy/policymaking analysis creates a context in which particular terminology is developed. The resulting product is a combination of sociological theory, historical perception, and information science, forming a continuum between a pure process approach and a pure product approach.

The focus of this study is the application of an exploratory model to a specific historical segment of policy

creation; a process-oriented focus but one that is also holistic and systemic in nature. The entities, values, characteristics (of information, agencies, players) are an inherent part of both the process and the policy outcome of the process. Levitan's delineation and model of the infrastructure resides mid-way on the continuum, illustrating the interconnected nature of the people, resources, processes, and technologies.

Policy, defined by McClure (1989, 275), is "a standing decision characterized by behavioral consistency and repetitiveness on the part of both those who make it and those who abide by it". At the Federal level, policy is evidenced in public law, regulations, court decisions (Braman 1988a, 1988b, 1989a, 1989b, 1990), and agency directives.

Throughout the legislative process, evidence of the prevailing political ideology emerges in documentation of the stakeholders' contributions, debates, and actions. Interpretation of the existing ideology as it relates to the policymaking process is offered by Majone (1989), Hernon (1989), and Bishop, Doty, and McClure (1989), among others.

Majone's (1989) characterization of the policymaking process in terms of debate terminology illustrates the elements of ideological shift necessary for the evolution of more contemporary policy out of existing policy. She emphasizes the role of ideas in guiding policy development



and the relationship of theories to policies and institutions. Majone asserts that the prevailing ideology represents a "meta-policy" of "ideas, conceptualizations, and proposals advanced by policy actors. . . ." (1989, 147); a pre-existing environment which provides the context for the emerging policy and which influences and guides the policymaking process. Majone defines this context as one "that is characterized by norms, beliefs, goals, and pressures. . ." (1989, 146). From within this incubator, the ideological mix that is the current sociopolitical environment generates either the seeds of self-renewal, perpetuating the status quo, or moves in an altered direction.

Bishop, Doty, and McClure (1989) illustrates the direct impact of value judgement and ideological assumption upon policy outcome in her delineation of the conflict between "basic premises of IRM and traditional governmental values, goals, and functions" (1989, 45). In an effort to control the bottom line, in measures cast by the private sector to foster profit, government has slipped from its former ideological stance of existing to serve the public. Bishop asserts that the goal of "maximizing the benefits of government information and increasing the effectiveness of government services, . . . are, . . . for all practical purposes, reduced to the goal of cost containment by [Circular]A-130" (Bishop, Doty, and McClure 1989, 41).

Embedded in the policymaking process, subtle value shift has disabled the usefulness of information through reuse, true dissemination, and value-added processes. Prohibition and cost containment have replaced public service goals of "maximizing the usefulness" of government information to all users" (Bishop, Doty, and McClure 1989, 45).

Information policy must be defined by first acknowledging the inherent characteristics of information then, by extension, information policy; explored by Braman (1988a, 1988b, 1989a, 1989b, 1990, in press) and Cleveland (1982, 1985) among others. Cleveland's characteristics of information, common to both of his lists, include expandable, substitutable, transportable, diffusive, and shareable (1985). These slippery characteristics have proved to be incongruous and unmanageable when forced into the reified mold of policy governing goods and services. Further, according to Bishop, Doty, and McClure (1989), the entire context of information as a resource defies the assessment of value via traditional economic and scientific avenues. Braman (1990) contends that this collision of previously workable assumptions with information and information technology has produced immediate problems over a broad range of practical concerns: telephone networks, access to information, and privacy, for example. The information technology which expands human knowledge for policymaking and other tasks "begins to drive Federal policy

rather than the other way around" (McClure, Bishop, and Doty 1989, 66). Consequently, large theoretical issues with socioeconomic, political, and cultural implications demand immediate attention from the policymakers.

The evaluation of gaps in response to this knowledge, technology, and policy quagmire emerges as policy analysis. Information policy analysis is viewed as a necessary activity relevant to the development of any coordinated policy process. Therefore, several authors are found on both sides of the continuum, writing first to analyze the policy then building theoretical remedies in alternative processes. Bishop, Doty, and McClure (1989); Caudle (1988), Caudle and Levitan (1989); Doty and Erdelez (1989), Hernon (1986a, 1986b, 1989); and McClure (1989) all represent this two fold approach. Comparison reveals that all segregate the policy analysis from the theoretical remedy in their written work. Even when approached in the same article, the two aspects of policy and process are addressed in separate sections. One possible analysis is that all, like McClure, include policy and policymaking in the category of policy analysis.

### **Policy Analysis Orientation**

Bishop's analysis first attacks the policy assumptions, and concludes in agreement with Braman, referring to the unworkable nature of the given structure. Bishop's central disagreement with the existing policy structure is the

assumption made by Federal agencies in charge of information resources management that information is an economic good. Bishop contends that policy, as formulated in all government contexts, must recognize "information's role as a social good, as a contributor to the social good, and as an essential element in upholding democratic values. . . ." (1989, 45). In short, the Federal Government's approach to the problem is misdirected and the context of the problem misunderstood.

Caudle's assessment concurs. The government's focus has been on the physical entities, specific records, letters, etc. rather than "thinking of integrated information systems for external and internal networking and information access and service centers" (1988, 793). Citing her 1987 study, Caudle illustrates attempts to manage information by hands-on, hierarchical administrative oversight. Through lengthy interviews with four levels of information resource managers and officials (1988, 790), Caudle uncover a propensity toward information technology management and control of Federal report pages required to fulfill agency requirements. What has been missed is the "critical nature of information management as it has evolved into the 'Information Age'" (1988, 793). Working in conjunction with Levitan, Caudle asserts that the structure of the government, in its departments, agencies, houses, committees, and subcommittees which function as isolated

organizational entities, poses the largest challenge. The threats to territorial jurisdictions, organizational structure, and professional status constitute an environmental challenge to restructured thinking about information.

Hernon, McClure, and Relyea (1989) analyze existing policy, explore varied frameworks for study and analysis of government information policies and suggest possible avenues for development of an entire discipline based upon government information policy. Throughout their work, Hernon, McClure, and Relyea (1989) reinforce the need to address government information policy analysis with realistic tools, ones which allow for the divergent elements of society, inclusion of perspectives of all stakeholders, and the ability to conceptualize relevant issues from the political perspective. Though the last point would seem to be the most obvious, the opinions of the authors uniformly suggested the lack of tools which allow for the exigencies of political ideology or the volatile nature of public opinion. Similar to the approaches of Bishop, Doty, and McClure (1989) and Caudle (1988), Hernon, McClure, and Relyea (1989) focus first on the policy as an entity; its structure and implications. The second aspect of their analysis is then focused on theoretical remedies for the uncovered deficiencies.

Authors Cronin (1987), Chartrand (1985, 1986, 1989) and Jeong (1990), choose a general, conceptual approach which often attempts to organize the factors and factions (or stakeholders) involved in the policymaking scenarios, rather than suggest avenues for attacking the policymaking process. Though they offer some process-oriented suggestions for resolution of perceived difficulties, their primary focus is that of policy analysis. Cronin (1987), studying both the United States and Great Britain, examines regulation, deregulation, the nature of information in the economic marketplace, and the nature of agencies charged with policy development. Through his transatlantic comparison, Cronin also concludes that the mechanisms and structures now in place are inappropriate for the realities of the information economy.

Chartrand, strategically placed as a Sr. Fellow in the Congressional Research Service of the Library of Congress, rarely ventures to suggest possible framework alternatives (1985, 1986, 1989). His approach is one of historic chronicling. Chartrand's focus is upon the roles which have been filled by technology in the context of the legislative process, documenting projects and legislative action in which technology served or interacted with the congressional environment. Viewing the Congress as "a microcosm of the larger-scale events that are transforming our global society in this Information Age", Chartrand (1986, 204) errs in

assuming that global society moves, changes, and assimilates information technology in patterns parallel to that of the U.S. Congress. Uniform access to information and information technology is not a reality for all segments of society, nor for all individuals residing in a given state, county, or community.

In a third approach, Jeong suggests an economic analysis of the information sector as precursor to finding implications for information policymaking and policy analysis. His analysis defines the information society in terms of the economic input from the information sector and information work. Using proportioned contribution to the GNP as criteria, Jeong attempts to define the nature of the information society and show interrelationships among the information sectors. His work, however, also isolates policy from process.

#### **Policymaking Process Orientation**

The opposite pole of the continuum is represented by those who's extreme process orientation all but excludes the entity of the policy. Examples found in current literature include Dror and Hogwood, with Dror as the most extreme in pursuit of policymaking process analysis. Dror's study (1983) applies organization theory to analysis of the decision making process. His thirteen characteristics of organizational decision making include apt descriptions of Federal level procedures, though analysis of a specific

organizational entity was not his stated goal. Citing structure by tradition, power laden relationships, formal division of work, subunits and subdecisions, bargaining, coalition formation, etc., he states that "organizational decisionmaking usually proceeds without clear operational goals. . . adjusting slowly to new needs and technologies" (Dror 1983, 83). Dror's model, which he titles the "Optimal Model" (1983, 154), includes the rational aspects of the decisionmaking process, evidenced in McClure (1989), Levitan (1982, 1987), Jeong (1990), and others. However, McClure's process model is bolstered by the inclusion of "extrarational components" (1989, 154) of creativity and intuition and provision for extensive feedback. Finally, his model is characterized by its qualitative nature, rather than quantifiable algorithm (which McClure asserts is impossible at this time when so little is known about the process) (1989, 156).

The cyclical nature of Hogwood's policy succession (1983, 1) and the characteristics he attributes to the process agree in concept with other critics of the policymaking systems of the Federal government. Hogwood, however, sees most evaluation literature as stopping short of useful application to actual performance. The iterative nature of policy succession is illustrated in Hogwood's assertion that existing policy creates conditions requiring change, areas of conflict where further policy is needed to



solve problems. His description of interorganizational dynamics (1983, 126) creates a summation of the processes evident in the Federal level policymaking.

To understand the implementation of a policy or program is to understand the interorganizational politics of the program as organizations encounter each other in the field and conflict over authority, money, and clients, and attempt to resolve their differences by some sort of political process.

Majone (1989) and Plocher (1988) offer two other examples of process oriented explanations of policy difficulty; each unique in approach. Majone (1989) interjects the elements of evidence, argument, and persuasion into process analysis stating that we must acknowledge the "continuous process of debate and reciprocal persuasion" (1989, 1) which she views in all public policy. Plocher (1988) writes from the perspective of a Washington watchdog. As attorney for the group OMB Watch, he chronicles the processes which led to control of the information resources by the OMB.

### **Policy and Process Synthesis**

Braman (1989a, 1990, in press), Cleveland (1985), Horton (1990a, 1990b) and Levitan (1987) present obvious combinations of policy and policymaking process analysis,

placing them, for purposes of the continuum, at a central point. All four represent a more visible holistic approach to information policy and policymaking critique. In their approaches values, entities (such as agencies and stakeholder groups), and characteristics (of both players and information) are all inherent parts of both policy and policymaking in the information society.

Braman (1989a, 1989b, 1990, in press), Cleveland (1985), and Levitan (1987) share common ground with Dror (1983) in observing the integrated nature of the process, an aggregate of subunit decisions, the end product of which is greater than the sum of its parts. Horton (1990a, 1990b) utilizes the behavioral science concepts of driving and constraining forces to develop a matrix illustrative of access to and dissemination of information. Combining that framework with an information life cycle model, Horton (1990a, 1990b) examines sharing and disclosing at various junctures throughout the information life cycle. The result is a graphic representation of both policy and process, with the burden of proof placed upon "the shoulders of the information owner to prove why he/she should not give up the information" (1990a, 18). One unique feature of Horton's matrix is that the missing information in a particular "cell" (1990b, 28) reveals process action and/or needed action as much as those cells of the matrix which are full of information.

Levitan (1987), Braman (1989a, 1989b, 1990, in press), and Cleveland (1985) share aspects of common ground with Horton (1990a, 1990b) in the use of life cycle concepts, characteristics of information, and information as an identifiable resource. Cleveland's observations (1985) also parallel Braman's (in press) in his use of organization theory. His predictions are an optimistic analysis of the information society through the lens of new paradigm organizational change. Cleveland's opened, flattened hierarchy, "spreading of benefits", "maximization of choice", public commons (1985, 193) suggests policy imperatives based upon diffusion of power and "leadership of the informed" (1985, 188).

Braman's prolific output (1988a, 1988b, 1989a, 1989b, 1990, in press), evidences some evolution in approach from application of an information production chain to use of an organizational systems metaphor, yielding policy principles from organizational theory. Her early work, focusing on the relationship between the power of information and social forces, utilizes decisions of the U.S. Supreme Court as examples of application of reified processes applied to information policy formulation.

Though many of the central assumptions remain the same, Braman's (1990, in press) more recent work eschews a simplistic category approach for a systemic one with characteristics of morphogenesis, autopoiesis, and

holographic representation. Application of these characteristics to the state, or the governing entity with the broadest application of power, yields a flexible, dynamic, non-hierarchical, self-renewing organizational system in which policymaking is accomplished relevant to all stages of the information production chain.

Two key points tie Braman (1988a, 1988b, 1989a, 1989b, 1990, in press) and Levitan (1982, 1987) in their explorations of information policy and policymaking in the socio-political context of the information society. First, the representation of the information life cycle represents an awareness of information as a resource entity. The concrete definition given in Levitan's earlier work, identifies an information resource as "a stock of information that has been societally institutionalized for reuse by one or many classes of users" (Levitan 1982, 44). Both Braman (1988a, 1988b, 1989a, 1989b, 1990, in press) and Levitan (1982, 1987) consider the institutionalization process to encompass more than one action taken one time in a linear progression. Rather, the nature of information demands renegotiation of the institutionalization process, according to need, within the framework of Braman's systemically evolving state (in press). Second, both express the necessity for inclusive infrastructure; holographic in the sense that each segment (person or agency) has the

capacity to attain knowledgeable participation and evolutionary in organizational growth.

### **Modeling as a Heuristic Device**

Clarification of the policymaking process invites application of modeling, traditionally applied to policy analysis and organizational structures. McClure's (1989) evaluation of modeling as a tool for policy analysis presents several alternative approaches for model creation as well as operational definitions and a discussion of the strengths and weaknesses of modeling. Several conceptual models are presented, Levitan's among them. He states the need to develop a "basis of descriptive knowledge of government information policy issues" as a primary reason for further encouraging the use of modeling as a study procedure (McClure 1989, 294). However, policy analysis in McClure's presentation of modeling, "includes assessment of both policy and policymaking" (1989, 275).

Specific conceptual realities are applicable to this investigation and the use of modeling as a heuristic device in policy and policymaking analysis. The nature of government information policy is historically rooted, somewhat evolutionary in addressing change and encased in institutionally perpetuated concepts of resource management. The reality of information as a resource is that it is dynamic in its evolutionary pattern, exhibiting rapid change in all areas expressed in Levitan's model. Though the rate

of change for the technological components of information is the most visible, processes, entities, users and producers (and the demands of both) constantly press the boundaries of information resources management. Therefore, without clarification of the policy goals, resources, structures, and processes illustrated by the model, information resources management processes and entities are held inert by the institutionalized processes. The response time gap between a singular change and the response of information infrastructure elements charged with oversight increases to the point of insurmountability each time action is halted by faulty communication, reified organizational structure and/or procedure, or blatant disregard of the informational environment.

Throughout the literature, the imperative for a national information policy is acknowledged to be a long standing wish. The multiple branches, agencies, committees, etc. which function with the capacity to formulate policy or policy directives complicate the processes and cloud the issues. The rapid advances of technological application to the information transfer processes in all levels of society further accentuate the problem as the institutionalized policymaking processes struggle to keep pace with change. Though each author approaches the task of policymaking process analysis with an individual agenda and perspective, each is motivated by the obvious discrepancy between the

capabilities of technology and the functioning of the state to address relevant issues.

Investigation of government information policy and policymaking process analysis have the potential to yield evidence of areas of overlap in the disciplines of information science and public policy. In the United States, where a cohesive national information policy does not exist, research also has the potential to contribute to the establishment of goals, procedures, and policy statements. Tested frameworks for such analysis are needed to decipher the interconnected relationships among various Federal level agencies, committees, and stakeholder groups. Finally, information policy issues and problems will become more complex as technological advances introduce additional untried relationships and control measures; multiplying the conflict and confusion. Therefore, the use of graphic models for information policy research offers options for analysis which are just beginning to be explored.

CHAPTER 3  
METHODOLOGY

The nature of Federal government information policy is both historical and evolutionary. Present policymaking issues are based upon previous policy and precedent. Additionally, the policymaking process as well as the people, resources, processes and technologies represented by Levitan's model, are exposed to the continual driving forces of technological advance and the cultural fluxuations in values and political ideology. This combination of events and ideas is evident throughout the Federal government's policymaking processes. However, distinction between the policymaking process and the end product, the policy, is rarely specified and difficult to discern in the realm of information policy. Therefore, the quest of historiography to overlay event with meaning is particularly appropriate as a national information policy is sought.

The specific case of Federal level information policy represents the confluence of emerging and receding paradigms, within the context of policymaking action. The guiding protocols and values continue to shape goals in terms of the industrial society. Unfortunately, the information resources which are the object of the



policymaking processes are firmly situated in the emergent paradigm of the postindustrial, information-rich socioeconomic reality.

In any policymaking process, the interaction among the diverse stakeholder groups is competitive, guided by recognized protocols and the desire to put forward specific values and goals. McClure defines a government's policymaking process as action "by which the public sector identifies, defines, and resolves societal problems and issues by allocating public resources" (1989, 275). The actions of current policymaking processes are still deriving meaning from old realities. The processes must be retraced, using the new realities of the emergent paradigm. The purpose in this case study methodology is to accomplish a preliminary retracing, using a model built on the new paradigm.

Two strategic decisions influenced the content and process of this case study. First, the selection of the Paperwork Reduction Act of 1980 determined the venue; the Federal government's legislative process for making public law. This choice also determined the sources from which the primary data would emerge. Second, the choice of Levitan's model as an exploratory heuristic device guided the organization of documentation and discovery of latent meaning in the analytical process.

The Paperwork Reduction Act of 1980 was selected as the object of this case study because it was the first attempt by the Federal government to revise past policy, manage present information, and initiate future standards in the areas of "general information, paperwork clearance, statistical activities, records management, privacy, and automatic data processing and telecommunications" (Paperwork Reduction Act of 1980, S1411). Specifically, it replaces section 3500 of U.S. Code, Vol. 44, last codified under the Federal Reports Act of 1942. Criteria for inclusion with the study data were: direct tie to Pub. L. 96-511, such as H.R.6410, and/or reference in the legislative history as a related bill; committee or floor action; report or document in the Serial Set.<sup>1</sup>

The specific parameters of this case study are defined by the legislative history documented by the Congressional Information Service: "H.R. 6410 and related bills" (Legislative Histories, 96th Congress, 2nd Session, vol. 11, 1142). A legislative history also appears where the Paperwork Reduction Act of 1980, Pub. L. No. 96-511, is printed in United States Statutes at Large, 94 Stat. 2826, (Paperwork Reduction Act 1980). This concise history only includes those reports, bills, and resolutions directly

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<sup>1</sup>The Serial Set is defined by Robinson as including "House and Senate Reports and House and Senate Documents"(p. 87); documents designating "non-congressional materials ordered printed Congress" and reports as congressional publications.

preceding the passage of the act. Therefore, the more inclusive history was chosen to allow a broader perspective of the policymaking process, relevant to the final passage of Pub. L. No. 96-511.

Congressional action regarding Federal government information began with the establishment of the Commission on Federal Paperwork, through P.L. 93-556. The Commission Report was issued in October of 1977. Though the Commission Report is not listed in the legislative history, it is included in the scope of this study because the Commission findings constituted the substance and intent of the Paperwork Reduction Act of 1980. The Paperwork Reduction Act of 1980 was passed December 11, 1980. Its legislative history is noted to begin with Senate hearings in July of 1975, in the Subcommittee on Reports, Accounting, and Management (U.S. Congress, Senate 1975).

Following the established criteria, 6 House Hearings, 6 Senate Hearings, 4 House Reports, 2 Senate Reports, 1 House Committee Print, 2 House Documents, 1 Joint Committee Hearing, 1 Executive Order, and 1 Presidential statement were included in the documentation for review in detail. A chronological listing of the Congressional actions can be found in Appendix B. For purposes of this case study, the Congressional actions will be discussed in chronological order, spanning the time period from 1975 through 1980.

Validation of the data will be accomplished by seeking documentation in government produced information. Since the data describes a public law and actions and processes accumulated from inception to passage, the existence of verifiable data is deemed necessary by the manuals published by each chamber of congress.

Access to government produced information is the same two-fold consideration as for any other research information sought; both intellectual and actual or virtual access. The decentralization of the Federal government often contributes to making both verification of the documentation and obtaining the documentation difficult. Of the approximately 8,000 government departments and agencies, only two regulate information production and distribution (Robinson 1988, 3). None has the power to regulate all government information activity. The two primary agencies responsible are the Joint Committee on Printing, which supervises the Government Printing Office, and the Office of Management and Budget (as a result of Pub. L. 96-511). The Government Printing Office and the National Technical Information Service are the two major printing and disseminating agencies (Robinson 1988, 3). Other clearinghouses, information centers, and private distributors also contribute to the general availability of government information but none has a complete list of all government-initiated information, either by time period or

topic. Therefore, the notion of tracking any issue or action completely, in terms of exhausting government resources, is a fallacy.

Two key elements contribute to the lack of assurance that the public has complete knowledge of what is available via government dissemination. The first element is the fact that government information not produced by the GPO and/or not announced by the issuing agency is not recorded and therefore not available for physical access. Though the Government Printing Office and the Superintendent of Documents play key roles in reproducing and distributing information for the Federal government, neither has editorial control. The GPO must produce whatever the branches, agencies, committees, etc., authorize. The discretion of the participant committee, subcommittee, or agency plays a key role in the visibility of and access to the documentation for specific pieces of legislation.

The second consideration is the inherent limitation assumed by the word, publication/document. The term, as used in legislation dating from 1962<sup>2</sup>, referred primarily to printed entities. However, some resources are not produced apart from electronic technology. Their existence leaves no trail and no recorded history of the decision-making processes of the issuing agency. Therefore, technology has

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<sup>2</sup>The Depository Library Act of 1962, which updated and redefined concepts contained in the General Printing Act of 1895.

forced the understood inclusion of electronically produced and stored information, audiovisual resources, and various micro formats. The unwritten practice versus the actual letter of the law creates its own venue for controversy. All of these factors contribute significantly to the way in which data for this study was researched, accessed and physically available.

Once the relevant data was obtained, the first objective of the analysis was that of ascertaining participants (individual or group), documented procedures, objects considered for regulation, and entities (technological or human) affected by the regulatory proposals. In this case study, legislative history elements will be considered first in chronological order, seeking evidence of correspondence to the model infrastructure suggested by Levitan. Pertinent questions are process-centered as opposed to analysis of the policy recommended by the bill, resolution, or report; such as identification of the people, resources, processes, and technologies, interconnection of the four major categories which corresponds to Levitan's suggested infrastructure model, and evidence of linkage to the dynamics of the information-based society as expressed by Levitan (1982, 1987), Cleveland (1982 1985), Braman (1988a, 1988b, 1989a, 1989b, 1990, in press), and others.

The second objective of the analytical process is interpretation of the meaning of the policymaking process, via comparison and contrast with the dynamic system illustrated by Levitan's model and the conceptualization of the information-rich socioeconomic milieu delineated by current research (Bishop, Doty, and McClure 1989), (Braman 1990, 1991), (Caudle 1989). Critical analysis of the present, institutionalized policymaking processes can reveal junctures for opportunistic intervention in the current evolution along established protocols and tried paths. Clarification of the processes, plus the resources, people, and technologies has the potential to redirect basic philosophical assumptions which presently guide policymaking at the Federal level. Re-education, at this basic level is a prerequisite to the conceptual shift necessary for policymaking processes to correspond more realistically to the information-driven socioeconomic environment of the twenty-first century.

## CHAPTER 4

### ANALYSIS

#### Introduction to the Documents

The policymaking process which produced the Paperwork Reduction Act of 1980 began with the formation of the Commission on Federal Paperwork, in 1974. The stated purpose of the Commission "was to recommend means to minimize the burden of Federal paperwork requirements" (U.S. Congress, Senate 1980, 4). Federal government information policy legislation which emerged after 1977, when the Commission Report was released, and through the 1980's was a direct result of the multiple interactions among the people, resources, processes and technologies during a period when the prevailing political climate was characterized as "a popular backlash against government regulations and red tape" (Plocher 1988, 318). These four general categories of people, resources, processes and technologies were, simultaneously, the objects of the Federal legislation and inherent components of the information infrastructure.

The intent of the Commission was translated into the Paperwork Reduction Act of 1980, which established the Office of Information and Regulatory Affairs (OIRA) within the Office of Management and Budget. With the passage of P.L. No. 96-511, all intended powers of coordination, integration, collection, maintenance, dissemination focused on the OMB (Paperwork Reduction Act 1980). The Director of



OMB became sole arbiter of "which information is to be considered essential to agency operations . . . Only that information shall be generated, collected, and disseminated" (Doty 1990, 68). The final step in the legislative sequence revising 44 U.S.C. occurred five years later with the publication of OMB Circular A-130, "The Management of Federal Information Resources" (50 Fed. Reg. 52,730 1985).

For the purposes of this analysis, an initial summary of the legislative process will be followed by discussion of the process documentation as correlated with the elements of Levitan's exploratory model. The discussion will proceed in this order: policy goal, policy resources, structures and processes; information resources management, information users and producers, information entities and processes, and information technologies. One caveat exists. In the context of written communication, some "order" must be imposed to facilitate understanding. However, this order should not be taken as indicative of either a fixed characteristic of the model or as portraying a linear process of cause and effect.

### **Legislative Process**

The Federal Depository Act of 1962 defines a government document as "informational matter which is published as an individual document at government expense, or as required by law" (Federal Depository Act 1962); either by or for a government agency. Production of government documents is the

process by which the public is informed of and by government action. The accumulated documents produced during the legislative process represent the law's legislative history, delineating legislative intention and interpretation, plus Congress's justification for initiating the process and enacting the law. All of the primary data for this case study is in the government produced records of the committee hearings, subcommittee hearings, floor actions of Congress, and in the recorded, codified legislation.

Legislation, as represented by Pub. L. No. 96-511, begins as a bill, joint resolution, concurrent resolution, or simple resolution in either the House or Senate. Introduced by one or more sponsors, the legislation's first test through deliberation is in committee or subcommittee. The work of the committee may be accomplished through hearings or a commissioned study. Documentation of this initial process emerges as a hearing, committee print, report, or document.

Hearings chronicle the testimony, discussions, questions, and any submitted supplementary material utilized by the committee to gain information about the legislation under consideration. A committee print, prepared by in-house research staff, is the result of special research for background information, statistics, history, or analysis. Reports, the committee method for informing the whole chamber of Congress, contain the wording of the proposed

legislation plus a detailed analysis of committee rationale, issue summary, minority opinions expressed during the hearings, and detailed typographical comparison of proposed changes with any existing legislation/law. The report is also used as a guide to the legislative intent of the future law, should questions arise in the executive or judicial branches of government.

When committee work is concluded, some action is taken by the chamber. The floor action may or may not result in forward movement of the legislation. Debate, possible amendment, and voting occur first in the chamber of origin and then in the second chamber. The act, so designated upon passage by the first chamber, then progresses through the same sequence of events in the second chamber of consideration.

In the final legislative step, the act is forwarded to the President, but only after both chambers have approved identical versions. Differences are resolved through additional committee work. Presidential action -- signing, veto, or even no action -- may either make the legislation into a public law or return it to Congress for further action.

Once the bill is officially passed into law, it is given an identifying public or private law number. Each is first published separately, in a small pamphlet form called a slip law. This form also includes "citation to their

future location in the Statutes at Large, marginal notes, citations to the U.S. Code, and a brief legislative history" (Robinson 1988, 81). Public laws are then bound, in chronological order, into Statutes at Large and subsequently into the U.S. Code, by subject arrangement. Concurrent reproductions of the new public law may be located in a variety of other sources, both commercially and governmentally produced.

Regulations, as distinguished from laws, must be presented for public input before the final form of the regulation is written. Robinson cites a study on Federal regulations which found that "almost half of all regulations go on the books with no public comments at all" (U.S. Congress. Senate 1977, viii). Further, "not only are regulations unclear to the general public, they can be incomprehensible even to the people who wrote them" (Robinson 1988, 91); a testimony to the language and access barriers existing in regulation research.

The Federal Register, the Code of Federal Regulations, and the United States Code Congressional and Administrative News all represent reliable print sources for Federal regulations. Each is first published in the Federal Register, then codified yearly into the Code of Federal Regulations. Regulations are revised on a staggered basis throughout a year.

### Policy Goal

According to Bishop, Doty, and McClure (1989), Levitan (1987) and others, the Commission on Federal Paperwork sought to consolidate the management of Federal information resources by the "establishment of a small, high-level, OMB policy staff, closely overseen by Congress, to deal with privacy, confidentiality, access, and information sharing" (Caudle and Levitan 1989, 303). Intermingled with the stated goal is the intent to increase the effectiveness of information resources management at the Federal level, strengthen Federal records management, oversee the "efficient acquisition of information technology" (Bishop, Doty, and McClure 1989, 40), and consolidate power in the Executive Branch of government; specifically power for policy direction. Caudle summarizes the intent of the Commission's thrust as "the effective identification of information needs and the building of management systems and procedures to meet these needs" (1988, 304). The ensuing committee and subcommittee meetings reflect the perceived connections between the goal proposals of the Commission and the particular thrust of the acting Congressional committee. Two general groupings of committee discussions emerge; those that concentrate on physical actions related to Federal government information and those which suggest a structural or procedural change, usually a power shift -- which would then be translated into governance of a physical action. An

additional division of the legislative documentation, pertinent to policy considerations, is between that which was issued before the report of the Commission on Federal Paperwork and that which followed. Significance of the timing of ante-commission work is in its correspondence to the suggested goals released by the Commission.

Prior to the release of the Commission report, the Senate Subcommittee on Reports, Accounting and Management convened several times to investigate information collection at the Federal agency level. Hearings, held July 22 and 24, 1975, considered "methods to improve accuracy, adequacy, timeliness, and availability of regulatory agency data collection" (U.S. Congress. Senate 1975). When hearing documentation was released in permanent form, the official subject title read, " Information Management by Federal Regulatory Agencies" (U.S. Congress. Senate 1975). The same subcommittee met again in October, 1975, to consider three separate bills proposed to reduce the burden of Federal paperwork on individuals and business; The Records Management Act (U.S. Congress, Senate 1975, S998), The Form Reform Act (U.S. Congress, Senate 1975, S2132), and The Government Forms Justification Amendment of 1975 to amend the Federal Reports Act of 1942 (U.S. Congress, Senate 1975, S2443). In May 1976, the Senate Subcommittee on Reports, Accounting, and Management convened once again to evaluate

the Paperwork Review and Limitation Act of 1976 (U.S. Congress, Senate 1976, S3076).

The common goal in all Reports, Accounting and Management Subcommittee meetings described, is the effort to control the physical entities of report forms, formats and quantities of forms imposed upon the public sector. Though these concerns mirrored the public backlash mindset against Federal paperwork, the designation as information resources management illustrates the focus of the legislative branch interpretation regarding information policy.

The Senate Subcommittee on Oversight Procedures joined the Senate Subcommittee on Reports, Accounting, and Management in the hearings of October 1975 and May 1976 (U.S. Congress. Senate 1975) (U.S. Congress. Senate 1976). The significance of noting this combined effort is in the increase of players involved in the formulation of information policy at the Federal level and the perceived overlapping jurisdiction among Federal level stakeholders. The stated goal, in both hearing occasions is the reduction of Federal paperwork on individuals and businesses.

In each of these hearings, the focus is on particular actions or physical components of the Federal government information collection system. In that respect, they are in alignment with one of the stated purposes of the Commission Report, since the specific goals were to improve the traffic flow of the Federal paperwork and/or to make the physical

paper entities less objectionable to the public (U.S. Congress, House, 1977). However, the Federal legislative interpretation of information resources management must also be held in comparison with the information professionals' understanding of the concept, as expressed in current literature.

The House Subcommittee on Census and Population and the Subcommittee on Government Activities and Transportation also met prior to the Commission report. However, their hearings were focused on the shifting of power to effect a change in methods of information collection and management (U.S. Congress, House 1976). The Subcommittee on Government Activities and Transportation, meeting in July of 1975, discussed nine related bills which attempted to strengthen the General Services Administration's authority to force Federal agency compliance on records management issues (U.S. Congress, House 1975). Similarly, the Subcommittee on Census and Population, meeting in February of 1976, considered the need to increase coordination and planning of Federal statistical data, through a singular agency (U.S. Congress, House 1976).

Specific consideration was given to the type and amount of authority given to both the General Services Administration and the National Archives and Records Services to force compliance by Federal Agencies on matters of records management. Both committee reports indicate a



focus on the burden of Federal paperwork requirements, in addition to control and authority (U.S. Congress, House 1975) (U.S. Congress, House 1976). Two products of these hearings were published to highlight specific issues of concern to the committees. The Congressional Research Service published the Records Management Issue Brief #1B75018, in April, 1976, addressing the requirements and compliance procedures relevant to The Record Management Act of 1975 and The Federal Records Management Act of 1975, which were under consideration with seven other bills; all dealing with Federal records management.

The second published committee work was House Committee Print no. 95-1, titled "Coordination in Federal Statistical Gathering Projects" (U.S. Congress, House 1976). In addition to the burden of the Federal level paperwork, the overlap of state and Federal data and the quality and timeliness of Federal data were highlighted, based on the Subcommittee on Census and Population hearings. The OMB figured prominently in these hearings as the locus for increased coordination, planning and oversight.

The common approach shared by all of these -- which preceded the Commission report, whether they approached Federal information requirements via paper entities or power-related issues, is that all of the initiatives concern information entity management strategy; the shuffling of physical entities of forms, development of quality

regulations and frequency determination. In contrast, the information policy, as defined in the literature, would include development of an underlying philosophical structure to guide evaluation of procedures, departments, etc. On the basis of Committee Reports and Documents, one would have to conclude that, prior to the release of the Commission on Federal Paperwork Report, committee time was given exclusively to the consideration of mechanical tasks connected with information management.

Following the release of the report from the Commission on Federal Paperwork, six separate acts were introduced and considered by committees which, in the opinion of the committee members, contributed to the policy goals of the Commission report. The Federal Statistical Activity Control Act of 1978 (U.S. Congress, House 1978, H11253), the Paperwork and Redtape Reduction Act of 1979 (U.S. Congress, Senate 1979, S1411), the Public Printing and Reorganization Act of 1979 (U.S. Congress, Senate 1979, S1436 and House 1979, H4572) the National Publications Act of 1980 (U.S. Congress, House 1980, H5424) the Paperwork Reimbursement Act (U.S. Congress, Senate 1980, S604), and the Paperwork Reduction Act of 1980 (U.S. Congress, House 1980, H6410) all reacted, in some measure, to the Commission on Federal Paperwork's report. Though the Paperwork Reduction Act of 1980 was the legislation which survived the gauntlet to replace the Federal Reports Act of 1942, all six contain an

identifiable focus, management of some portion of the Federal government's information resources.

The operative concept which characterizes the goals represented by the six acts is information entity management at the Federal government level. Each focuses on only one area, usually a mechanical or procedural aspect of the Federal government's information resources management. The Federal Statistics Activity Control Act discussed in the House Subcommittee on Census and Population, directed efforts toward the upcoming 1980 Census, in an effort to regulate data gathering activities and procedures (U.S. Congress. House 1978, H11253). The Paperwork and Redtape Reduction Act attempted to coordinate Federal information policy activities by establishing an Office of Federal Information Management Policy, to clear government forms (U.S. Congress. Senate 1979, S1411). The Public Printing Reorganization Act of 1979 emerged from companion bills to revise the authority for printing and distribution of government information (U.S. Congress. Senate 1979, S1436 and House 1979, H4572). The National Publications Act of 1980 addressed both the issue of publishing government information and the problems with distribution of machine-readable and audio-visual materials to depository libraries. (U.S. Congress. House 1980, H5424). Finally, the Paperwork Reimbursement Act was tied to both the Small Business Act and the Federal Reports Act of 1942. This proposal attempted

to control the amount and cost of the Federal paperwork requirements by shifting the cost to the public sector, since information was recognized as a public good (U.S. Congress. Senate 1980, S604).

In the Paperwork Reduction Act of 1980, most of the goals represented by the previous five legislative attempts were consolidated (U.S. Congress. House 1980, H6410). The Paperwork and Redtape Reduction Act of 1979 became the revised companion bill on the Senate side. Briefly stated, the goal of the Paperwork Reduction Act describes it as an act "to reduce paperwork and enhance the economy and efficiency of the Government and the private sector by improving Federal information policymaking, and for other purposes" (Paperwork Reduction Act 1980). Though this purpose appears to be broadly based, section 3501 simply itemizes specific portions of the formerly considered acts: to minimize the paperwork burden, to minimize the cost, to maximize usefulness, to make uniform Federal information policies, to insure the use of technology by the Federal government, and to maintain confidentiality, etc.. (44 U.S.C. §3501)

When the goal statements are extracted from these legislative proposals, the fragmented directives provide no foundation for a generalized policy statement. Each act purports to solve the dilemmas of information acquisition, maintenance, and delivery, while focusing on a particular

aspect of information transfer. The fourth purpose, in section 3501 of the Paperwork Reduction Act of 1980, comes closest to any philosophical statement of policy direction; "to coordinate, integrate and, to the extent practicable and appropriate, make uniform Federal information policies and practices" (Paperwork Reduction Act 1980). However, reports from the hearings for both H.R. 6410 and S. 1411 emphasize the physical aspects of keeping a lid on the paperwork demanded by Federal government agencies (U.S. Congress, House 1980) (U.S. Congress, Senate 1980). This focus is better characterized as management of information transfer at the Federal level, rather than overarching Federal information policy.

### **Policy Resources, Structures, and Processes**

Consideration of these three elements of the infrastructure emphasizes the unique arena of Federal government policymaking. All three are intertwined in the institutionalized system. None of the three exists outside the system or in isolation from the other two. At the Federal level, resources, structures, and processes are defined and constrained by previously codified law, operative tradition, and legal stipulation. Law and precedent delineate the law or regulation needing modification and the structure by which the law will be modified. The structures in which the process must be

executed and through which the policy will be administered are one in the same, unless the structure modifies itself. The impetus for modification is embodied in the demands of the fluxuating social-political environment and technological advance.

The policy resources categorized in Levitan's exploratory model encompass both the concrete entities of previous policy and the abstract concepts of knowledge and information. Along with Levitan, the works of Braman (1988a, 1988b, 1989b, 1990, 1991), Hogwood (1983), Dror (1983) and Cleveland (1982, 1985) make significant contributions to understanding the quantitative/qualitative nature of policy resources.

The quantitative aspect of policy resources is inherent in the legacy of two centuries of policymaking at the Federal level. Most policy is not new ground. Rather, according to Hogwood, "most policymaking is actually policy succession: the replacement of an existing policy, program or organization by another" (1983, 1). Thus, one obvious resource for present policymaking process is the existing policy, as illustrated by the existing version of 44 U.S.C., Chapter 35. The need for revision of this particular segment of codified law instigates the processes of evaluation and amendment design, exhibited in all six proposed acts and which resulted in the Paperwork Reduction Act of 1980.

The qualitative aspects of policy resources are more nebulous. An understanding of the characteristics of information resources acknowledged in information science literature (Cleveland 1982, 1985), (Levitan 1982, 1987), provides part of the background for an understanding of information policy in the qualitative sense. However, this knowledge is not yet part of the policy knowledge of those within the policymaking system at the Federal level. Dror's specific focus on public policymaking describes how these elusive characteristics of information impinge on the policymaking process and are crucial to its improvement (1983, 7). Dror argues knowledge about a specific policy should be divided from that which is knowledge about policymaking. Within the context of the Federal policymaking system, participants know the rules of procedure which govern the legislative process. However, the synthesis of those institutionalized procedures with the abstract concepts of information as a resource has not yet been achieved.

The quantitatively focused paradigm in the resource/process/structure web of institutionalized policymaking is severely handicapped in response to information and information technology issues. The multiple processes entrenched in the institutionalized policymaking system strain to adapt to the information flow and rate of change in the information-rich society. The ephemeral policy

resources, those requiring qualitative evaluation remain encased in the reified, institutionalized process-structure. The consistent and constant bombardment of that process-structure by qualitatively improved resources of knowledge and information has the potential to open new interpretive avenues for policymaking. However, to the degree that the system is unable to recognize and/or utilize the qualitative policy resources, the reaction-time gap is accentuated.

The infrastructure components of policy resources, structures, and processes present a unique dilemma to analysts who would remedy the present institutionalized processes. The three components are inextricably intertwined, yet must be individually evaluated; each on specific criteria of need for relevant conceptual understanding by all players in the policymaking process. Lack of knowledge about the policy area of information resources produces a skewed interpretation of all three enmeshed components.

### **Information Resources Management**

Information Resources Management, a central component of the information infrastructure model, is a designation of both an entity and an action. There is a subtle philosophical differentiation between the recognition of information resources management as a catch-all phrase for the manipulation of information entities and the concept of



information resources management as a theoretical understanding of the life cycle and qualitative value of information as a resource.

In comparison with the interpretations of information policy and information resources management found in professional literature, the questions addressed by the Ad Hoc Committee on the Revision of Title 44 (Federal Government Printing and Publishing: Policy Issues 1979) more closely approximate the components of qualitative information resource policy analysis. The Ad Hoc Advisory Committee was charged to "identify the major issues and policy questions involved in revising the statute [Title 44--the 9 chapter under the JCP]" (Federal Government Printing and Publishing: Policy Issues 1979). The six broad questions, which addressed issues over particular tasks or regulations, concerned the following:

- degree to which the Federal Government's printing and publishing should be centralized
- accessibility of Government information (including cost, format, and government support)
- the impact of technology on Government printing and dissemination
- the role of the depository library program
- locus for policy formulation regarding generation, production, and dissemination of Government information

• "Is Government information an economic good and/or a social good?" (Federal Government Printing and Publishing: Policy Issues 1979, vi).

The Paperwork Reduction Act, as passed in December of 1980, and the other five acts which contributed to its content, use the phrase "information resources management" as an umbrella term; similar to a portion of a job description. The House version of the act, as submitted in the Report to accompany H.R. 6410 (U.S. Congress, House 1980, H6410), specifically defines information resources management as

the planning, budgeting, organizing, directing, training, promoting, controlling, and other managerial activities involved with the collection or creation, use, and dissemination of information by Federal departments and agencies. . . In addition to these process stages of treating information, information resources management is defined in terms of the different functions which are assigned to OMB under Section 3504 of proposed new chapter 35, Title 44 United States Code. These functions are all related to the management of information by Federal agencies.

Information resources management activities are described throughout the legislation in concrete terms which delineate regulations and specific procedures. Concerns

addressed in legislative proposals, with the corresponding acts include:

- the paperwork entailed in the 1980 census (H.R. 11253, the Federal Statistics Activity Control Act of 1978)
- reconsideration of the locus of authority for printing and distribution of government produced information (H.R. 4572 and S. 1436, companion versions of the Public Printing Reorganization Act of 1979)
- where to recover cost for paperwork/forms and the clearance of the forms filed by small businesses (S. 604, Paperwork Reimbursement Act)
- coordination of government forms and restructuring of Federal information management activities within the OMB (S. 1411, Paperwork and Redtape Reduction Act of 1979)

- problems with the (H.R. 5424, National  
distribution of machine-  
readable and audio-visual Publications Act of 1980)  
materials to depository  
libraries
- establishment of a  
National Publications  
Office and National  
Publications Commission to  
replace the GPO and JCP

Both the companion bills and the Paperwork Reduction Act, as passed, purport to establish a revitalized, better organized, more accurate, focused structure for information resources management. However, when references to IRM are extracted from documentation of proceedings, examination reveals that discussion of tasks and regulations predominates. Critical comparison of the dominant legislative documentation with the understanding of information resources management found in professional literature, reveals that the theoretical understanding of information and IRM is distinctly absent from Federal legislation.

### Information Users and Producers

The participation of information users and producers in the infrastructure of the policymaking process is visible through the documentation of the hearings, committee meetings, testimony, and submitted remarks. However, the unique nature of information as a resource creates an enmeshed relationship in which the categories of user and producer are usually inseparable and often simultaneous. Unfortunately, the distinction is lost in the documentation of the legislative process, where participants were not categorized.

The segment of documentation which presented the broadest, observable user/producer base was the report issued by The Ad Hoc Advisory Committee on the Revision of Title 44. Fifteen organizations participated over a thirteen week timetable. The participants were "encouraged to be a 'devil's advocate' when they felt the discussion as not addressing all aspects of a particular problem so as to explore the full range of issues and alternatives" expressed in the six topics under consideration (Federal Government Printing and Publishing: Policy Issues 1979, v). Testimony was given by AFL-CIO, ALA, American Paper Institute, Commerce Dept., Defense Dept., Federal Library Commission, GPO, House Administration Committee, Information Industry Assoc., Joint Council of Unions, National Assoc. of

Government Communicators, OMB Printing Industry of America., and the Senate Rules and Administration Committee.

Information users and producers figure prominently in all legislative proposals throughout the legislative history of the Paperwork Reduction Act of 1980. By definition, the PRA attempts to modify demands made upon individuals, organizations, agencies etc. in terms of the forms required by law. In this context, all are information producers, supplying the government with the needed paperwork to continue administrative oversight of taxes, grants, etc. Similarly, the myriad agencies of the Federal government are addressed in the legislative proposals as producers of information; originating the forms for the required paperwork, output of publications, and varied information formats to the public. All producers at the Federal level were to be subject to the regulation of their respective paper outputs in order to make the information flow more cost effective. Unfortunately, cost containment rose in prominence until the producers, who may have wished to produce more which they considered useful, were stymied in their efforts by further regulations.

The juxtaposition of the user/producer in the information economy is highlighted in the suggested applications of paperwork control which emerged as proposed legislation throughout the Paperwork Reduction Act's legislative history. In each scenario, without exception,

producer restrictions afflict the user, and visa versa. As Sprehe noted, the Congress had "given Federal agencies fairly explicit policy about information collection processing, and about the public's right of access to government information upon request"(1987, 192). The Federal level defined input to the government agencies, then left policy regarding output largely undefined. Conversely, access was carefully defined, according to the Federal perception, but halted short of delineating agency "responsibility for actively reaching out and placing information in the public's hands" (Sprehe 1987, 192)

#### **Information Entities and Processes**

Investigation of the hearing documentation reveals no acknowledgement of the broad conceptual understanding of both entities and processes, as described in professional information literature. Participants in the hearings delivered testimony concerning the specific information and/or data manipulation procedures addressed by the legislation in committee. Thus, for each act under consideration, the particular tasks pertaining to statistical collection activity, small business paperwork, reduction of redtape, duplication of forms, printing of government documents, etc., were discussed in isolation from broader theoretical questions. Such specificity belies the general rhetoric which introduces Public Law 96-511; "To

reduce paperwork and enhance the economy and efficiency of the Government and the private sector by improving Federal information policymaking, and for other purposes" (Paperwork Reduction Act 1980, H6410).

Consideration of this infrastructure component, separated from the legislative procedure, illustrates the usefulness of the guided evaluation offered in model use. The nature of the Federal legislative process focuses on the correctness of the procedure, rather than the inherent components of the effected policy arena. In the context of the industrialized socioeconomic milieu, the cause and effect of a specific policy governing tangible, manufactured products is more readily visible. The characteristics of information as a resource tend to obscure the socioeconomic interrelationships in information processes, without the aid of an organizing model.

### **Information Technologies**

The place of information technologies in the legislative process is concentrated in two primary facets. The first is documented in the work of Chartrand (1985, 1986, 1989) and consists of the use of information technologies by the legislative branch of the federal government. The second is the regulation of those technologies.



Chartrand's position in his earlier work (1985, 1986) is best characterized in comparison with the earlier technological applications in the information service professions. The immediate concern of those participating in the technological reform was the replacement of one machine with another. Chartrand wrote, "the cascading information technologies are demanding the best efforts of those who plan and ensure the protocols and processes by which the Senate and House of Representatives function" (1986, 205). Microform, microcomputers, electronic mail and other telecommunications links allowed business to go on as usual, only faster. The technology added speed and convenience but was not recognized as a catalyst for new legislative paradigms.

With the influx of information technologies into Capitol Hill offices and global corporations, the Federal legislative branch instigated and passed "317 Public Laws relating to information, technology or information policy" (Chartrand 1989, 9). The Paperwork Reduction Act of 1980 was passed at a central point in the eleven year span of Chartrand's study. Broadly grouped, the legislation addressed issues in telecommunications, broadcasting, and satellite transmission; global communications; security and privacy; intellectual property; and information generation and dissemination (Chartrand 1989).

Though these issues will remain pertinent, it is important to recognize the timing of the legislation with regard to the advent of the specific technologies. Chartrand admits that the "significance of a given law often depends upon the time frame of referral--much like a 'stop-action photograph'" (1989, 10). The conceptual significance is that the isolated measures were passed as perceived answers to finite questions; a "snap-shot" response to a moment on the technological continuum. From the Congressional point of view, information policy was being created (Chartrand 1989). However, from the perspective of professional literature, broad-based strategy is lacking and the "stop-action photographs" continually play catch-up with technological evolution and the socioeconomic responses to that evolution.

## CHAPTER 5

### CONCLUSIONS

This study tested the application of an exploratory model to a specific instance of policy creation, using the model as an organizational device to explore the Federal policymaking process, as related to information policy formulation. Evaluation of the outcomes of this case study are analyzed in two distinct discussions. First, did the exploratory model satisfy the original hypothesis? Was identifiable correspondence observed between the elements of Levitan's model and the documented legislative process? A corollary question to the central hypothesis is whether or not the correspondence elucidated criteria by which elements of the Federal policymaking system may be categorized and identified. The final corollary concerns the visibility of interrelationships among the components of the policymaking system, as delineated by use of the exploratory model. The central question and the two subquestions encompass the primary objective of the case study.

The second venue of discussion concerns residual effects of exploratory model usage. Did the exploratory model perform as predicted by McClure (1989), yielding some additional data relevant to his three criteria? Briefly, was explanation facilitated, areas for further investigation highlighted, and development of descriptive and/or predictive models assisted?

This case study successfully tested the hypothesis and found it supported using this exploratory model. Use of Levitan's model did delineate, in an organized format, the components which were operative in the legislative history of the Paperwork Reduction Act of 1980, as studied. The secondary questions correlating to the central hypothesis were also partially answered. However, the incompleteness of the secondary answers is positive, because the analytical process produced data which satisfies McClure's performance prediction for exploratory model use (1989).

The correspondence between Levitan's Information Infrastructure model and the components of the Federal level information policymaking process was rather forthright, due to the generic quality of the terminology. However, the degree of correspondence to the terminology and categories is differentiated on the basis of semantic understanding. The conceptual understanding of both interrelationships among infrastructure components and criteria by which to categorize component parts are affected by the operational paradigm of the participants. Therefore, mutually understood criteria with which to describe infrastructure entities remains elusive until re-education of Federal level policy makers generates information age conceptualization of the terminology.

Though all terms contain some disparity in interpretation, the most striking example is in the category

of "Information Resources Management". The recurring irony of the information-rich society emerges in the qualitative/quantitative dichotomy observable between the Federal legislators' diverse understandings of information resources and the systemic, cyclical interpretation emerging from professional literature. Stakeholders, analysts, and policymakers use information and information technology to provide ever increasing amounts of feedback, within a shorter time frame. However, the interpretation of the information is executed through the materials-oriented paradigm of the industrial era.

McClure's projected benefits of exploratory model usage (1989) were evidenced in evaluation of case study data. Application of Levitan's model did highlight concepts and variables which help explain the Federal government's information policymaking process as well as areas where further investigation might be beneficial. One specific area in need of conceptual development noted in the case study process was the place of the Information Infrastructure model in relation to the conceptualization of the policymaking process.

Though the exploratory model satisfied the hypothesis, it was found to be incomplete as a process model. The structure served to organize the components of the process but the action of process is not an inherent characteristic of the model, as conceived by Levitan. Consideration of

possible future investigation might include combinations of Levitan's model with compatible theoretical material, like the work of Hogwood or Braman.

Hogwood's (1983) focus on the process of policy succession and the iterative nature of policy work lends mobility to the Infrastructure model. His examination of the rate of change and the dynamics of the policymaking process within organizations and jurisdictions combines well with Levitan's Information Infrastructure (1987, xvii). Both address issues of policymaking in the context of governmental frameworks. Hogwood's (1983) inter-organizational dynamics in conjunction with Levitan's (1987) structural model fleshes out those structural components which could be target areas for institutionalized agenda-setting. Levitan's work (1987) adds identifiable characteristics to the elements involved in Hogwood's (1983) fertilization, conflict, and strategic planning processes.

A second viable synthesis could be drawn from Levitan (1982, 1987) and Braman (1988a, 1988b, 1989a, 1989b, 1990, 1991, in press). The shared concept of the information life cycle provides a foundation for process understanding and exploration of deficiencies in structural elements. The use of Levitan's Infrastructure (1987, xvii) and Braman's life cycle orientation for institutionalized decision evaluation (1988a) has the potential to yield a matrix for component-

process correlation, based on information resource life cycle concepts.

As a final proposition, an amalgamation of Levitan (1982, 1987), Braman (1988a, 1988b, 1989a, 1989b, 1990, 1991, in press) and Hogwood (1983) addresses the exigencies of policymaking which Hogwood describes as problems and opportunities for government activities, some of which "will reflect technological and social changes, many of which currently cannot be foreseen" (Hogwood 1983, 2). All three assert there is no singular correct choice, rather a question of "how decision-making systems might be designed to cope with some problems" (Hogwood 1983, 221). Braman's "Entering Chaos: Designing the State in the Information Age" (in press) offers specific answers to Hogwood's question in terms of organizational theory and characteristics which allow malleability in contrast to the present reified policymaking structures and processes.

The present policymaking structure, at the Federal level, could easily be characterized as autopoietic, in the purely negative sense. However, combination of Braman's three key characteristics (in press); autopoiesis, morphogenesis, and holographic distribution of information and decision-making--all used as positive organizational descriptors--with the Information Infrastructure, transforms institutionalized practice. Braman's characteristics (in press) are already applicable to Levitan's (1987) resources

and, in some cases, processes. Were the policy structure and the Infrastructure to acquire these organizational attributes, Hogwood's "system designed to cope" (1983, 221) might, indeed, have a blueprint in hand.

The need to address the policymaking structures and processes through relevant, information age concepts will remain and compound as "information technology continues to drive Federal policy" (McClure 1989, 66). Continued investigation of modeling as a tool for information policymaking analysis has the potential to clarify theoretical concerns as well as interactions and interrelationships among stakeholders, entities, and structures throughout the policymaking process. Such exploration and the resulting knowledge might allow the contemporary policymaking system to uproot its mechanistic assumptions and chart a future course based on a realistic understanding of the information-rich society.



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## APPENDIX A

### ACRONYMS USED IN TEXT

|               |   |
|---------------|---|
| ALA           | American Library Association  |
| FR            | Federal Register  |
| GAO           | General Accounting Office   |
| GPO           | Government Printing Office  |
| GSA           | General Services<br>Administration  |
| H.R. + number | Designation for a bill<br>originating in the House of<br>Representatives and in process |
| IRM           | Information Resources<br>Management   |
| JCP           | Joint Committee on Printing   |

|             |  |
|-------------|--|
| NTIS        | National Technical Information Service   |
| OMB         | Office of Management & Budget  |
| OTA         | Office of Technology Assessment  |
| P.L.        | Public Law   |
| PRA         | Paperwork Reduction Act of 1980  |
| S. + number | Designation for a bill introduced in the Senate and in process                                       |
| STAT.       | Statutes at Large citation form; preceding number indicates which Congress passed the cited slip law |
| U.S.C.      | United States Code   |

APPENDIX B

CHRONOLOGICAL SEQUENCE OF CONGRESSIONAL ACTION  
LEADING TO THE PAPERWORK REDUCTION ACT OF 1980

1975

- Jul. 11                     House hearing on Record Management Act of  
1975, the Federal Records Management Act of  
1975 & 8 other related bills
- Jul. 22, 24               Senate hearing on "Information Management by  
Federal Regulatory Agencies"
- Oct. 10                   Senate hearing on Records Management Act,  
Form Reform Act & the Government Forms  
Justification Amendment of 1975 to amend the  
Federal Reports Act

1976

- Feb. 24-26               House hearing on coordination of statistics

Apr. 8                   Continuation of House hearing on coordination  
of statistics

May 3                    Senate hearing on Paperwork Review and  
Limitation Act of 1976

Sept. 13                House hearing on Federal Records Management  
Amendment of 1976

Sept. 13                Senate hearing on Federal Records Management  
Act of 1976

Sept. 28                Senate hearing on Federal Records Management  
Amendment of 1976

1977

Oct. 17                 House hearings on government information and  
individual rights and release of the Horton  
Report: "Privacy and Confidentiality Report  
and Final Recommendations of the Commission  
on Federal Paperwork"

1978

Feb. 23-24                    House hearings on FEderal Statistical  
Activity Control Act of 1978

Mar. 3, 10                    continuation of above

Apr. 13                        continuation of above

May 5, 8                      continuation of hearings on Federal  
Statistical Activity Control Act of 1978

Jun. 23                        House hearings to recommend passage of above

Jun. 28                        Senate hearing "Efforts to Reduce Federal  
Paperwork Burdens"

1979

Mar. 27                        Regulatory Reform message received from the  
President, by the House



May 23 Joint Committee on Printing releases "Federal Government Printing and Publishing: Policy Issues"; a staff report from the Ad Hoc Committee on the revision of Title 44, under the JCP

Jun. 27 Senate hearing on Federal paperwork requirements and the Paperwork Reimbursement Act

Jul. 10, 19, 24, 26 Joint hearings on the Public Printing Reorganization Act of 1979

Nov. 1 Senate hearing on the Paperwork and Redtape Reduction Act of 1979

Dec. 3 Paperwork Reduction message from the President

1980

Feb. 7, 21, 26 House hearings on Paperwork Reduction Act of 1980

Mar. 3 insertions added to House hearings by  
Commission on Federal Paperwork, OMB

Mar. 19 House report issued recommending passage of  
PRA

Mar. 26 Joint Committee hearings on Federal  
paperwork; PRA as an amendment to the Federal  
Reports Act of 1942 inserted

Jun. 4 House hearings on National Publications Act  
of 1980

Sept. 8 Senate report issued recommending passage of  
PRA

Nov 19 Senate version of PRA passed; passage vacated  
and House version of PRA passed in lieu

Dec. 1 House concurred in Senate amendments

Dec. 11

approval of Paperwork Reduction Act of 1980;  
also known as P.L. 96-511--cited in Statutes  
at Large as 94 STAT. 2812--codified as  
Chapter 35 of title 44, United States Code

Dec. 11

Presidential statement issued

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Deborah K. Scott  
Author

May 8, 1992  
Date

Case Study of Federal Information Policymaking  
Process Using Preliminary Application of an  
Exploratory Model to the Paperwork Reduction  
Act of 1980

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