

Author Full Name : Anonymous Anonymous**Received Date :** 10/19/2026 08:13 PM**Comments Received :**

The Annual Employee Survey is not merely an internal management exercise. Congress required annual employee surveys covering leadership, management practices, and employee experience, and directed OPM to prescribe questions permitting comparisons across agencies. Pub. L. 108-136, § 1128, 5 U.S.C. § 7101 note.

OPM now proposes to reduce the common questions from 16 to 10 and transfer survey administration from OPM to individual agencies, while continuing to collect agency results for governmentwide comparison. This is a material change in how the government generates information about its own management. The resulting data will be shaped by organizations whose leadership and practices the survey is intended to evaluate.

The central concern is institutional independence and public accountability. Decentralized administration can fragment a governmentwide measurement system, weaken comparisons over time, and make employee experience harder to assess consistently across agencies. These consequences matter particularly when the stated value of the collection rests on its usefulness for governmentwide workforce analysis.

The Paperwork Reduction Act requires a meaningful assessment of practical utility, effective management and use, and applicable statistical methodology. 44 U.S.C. § 3506(c)(3)(A), (H)–(I). OMB should not treat the collection as a ministerial consequence of an already announced policy change. It must independently examine whether the proposed collection, in its actual institutional context, satisfies those requirements.

I object to approval on the present record. OMB should not approve the collection merely because agencies will submit common-question results to central offices. The submission must stand on its demonstrated statutory utility, not on the assumption that decentralization preserves the value of the system it replaces. If that showing has not been made, OMB should return or disapprove the request.