eRegulations
Notice & Comment
Research Wrap Up
10.14.2016

18F

1/ Research

18F

Can we call the eRegs Notice & Comment pilot a success?

WHAT WE WANTED TO LEARN — EXTERNAL USERS

Will commenters break their comments down and use the pilot?

- If commenters are using the pilot, how does it fit into their drafting/submitting process?
- Do commenters want to use the pilot, or something similar, in the future?
- Is anything missing or impeding their ability to use the pilot?

WHAT WE WANTED TO LEARN — INTERNAL STAFF

Will this new comment format make the agency rulewriters’ work easier?

- Does this new format, make it easier and faster to sort comments?
- Does this new format change the way people write comments for the better?

Who did we talk to?

And when?

EXTERNAL USERS

Who did we speak to?

9
Total

2
Hazardous Waste Technologists

4
State/Local Government

3
Private Company or University

EXTERNAL USERS

How many of those users commented on the rule?

5

Commented successfully using the pilot

1

Wasn’t able to comment using the pilot

3

Didn’t plan to comment on this rule at all

INTERNAL STAFF

Who did we speak to?

2

eManifest Rulewriters

1

Contractor who usually sorts their comments

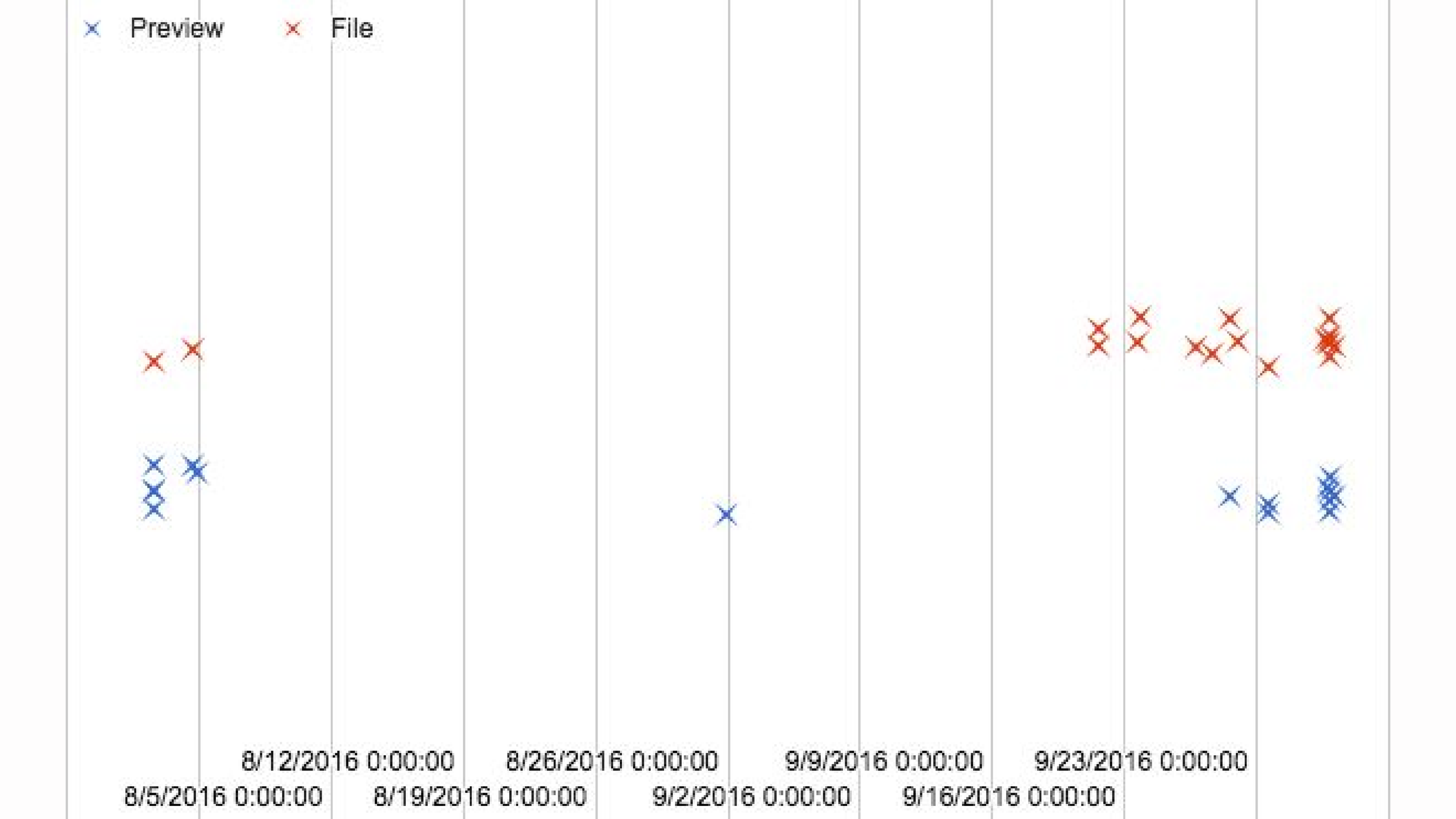
LET’S START WITH SOME STATS:

31 Comments total in FDMS

17 Submissions using the pilot

16 Previews using the pilot

54% Usage


Preview
File
8/12/2016 0:00:00
8/26/2016 0:00:00
9/9/2016 0:00:00
9/23/2016 0:00:00
8/5/2016 0:00:00
8/19/2016 0:00:00
9/2/2016 0:00:00
9/16/2016 0:00:00

WHAT DID WE FIND?

External commenters

“10/10. It was easy to do.”

“Modern looking. It enticed you to make comments.”

GENERAL IMPRESSIONS

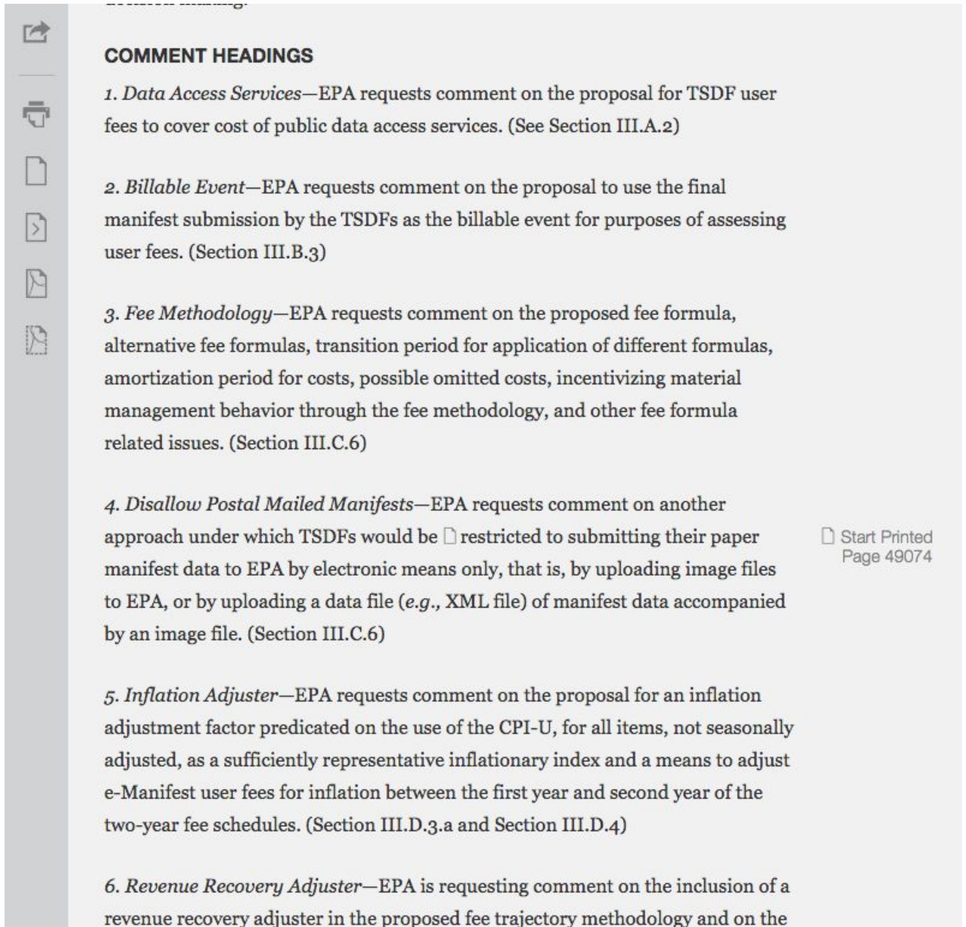
“I think you guys did a good job! We were always intimidated putting our comments into the EPA but this was so easy.”

Is this new comment format working for external users?

Generally, yes.

WHAT DID WE FIND — NEW COMMENT FORMAT

Topic based v.s. Section/paragraph based



COMMENT HEADINGS

1. *Data Access Services*—EPA requests comment on the proposal for TSDF user fees to cover cost of public data access services. (See Section III.A.2)

2. *Billable Event*—EPA requests comment on the proposal to use the final manifest submission by the TSDFs as the billable event for purposes of assessing user fees. (Section III.B.3)

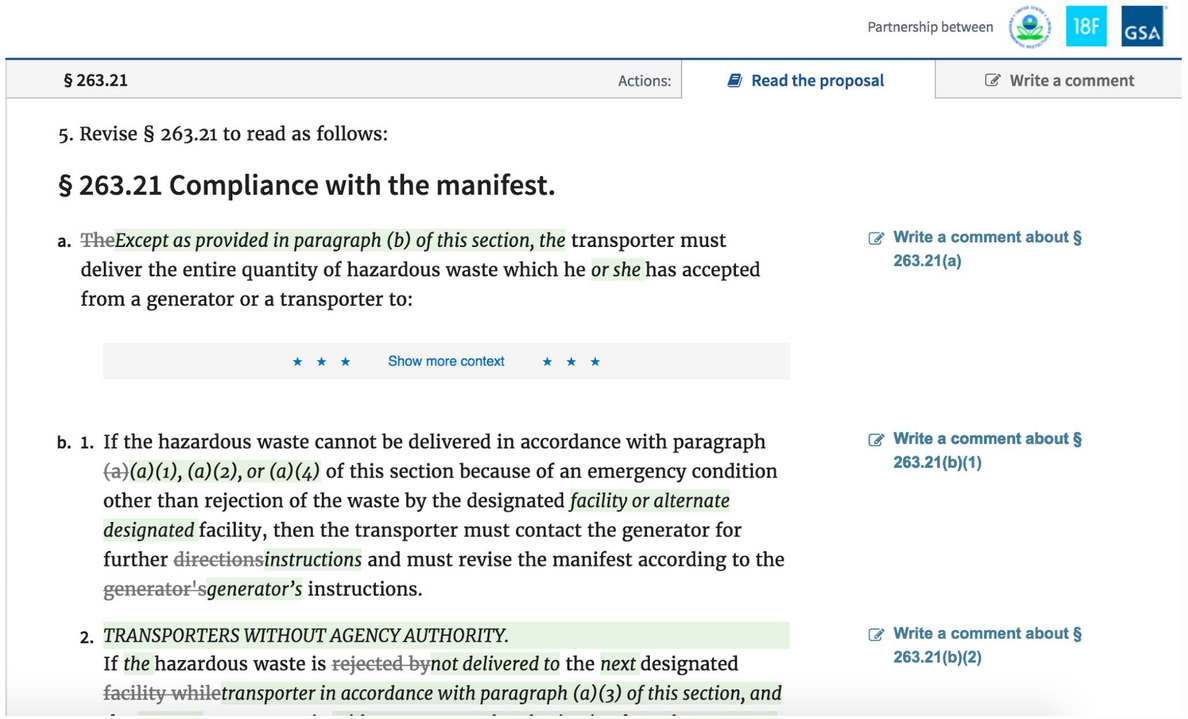
3. *Fee Methodology*—EPA requests comment on the proposed fee formula, alternative fee formulas, transition period for application of different formulas, amortization period for costs, possible omitted costs, incentivizing material management behavior through the fee methodology, and other fee formula related issues. (Section III.C.6)

4. *Disallow Postal Mailed Manifests*—EPA requests comment on another approach under which TSDFs would be restricted to submitting their paper manifest data to EPA by electronic means only, that is, by uploading image files to EPA, or by uploading a data file (*e.g.*, XML file) of manifest data accompanied by an image file. (Section III.C.6)

Start Printed Page 49074

5. *Inflation Adjuster*—EPA requests comment on the proposal for an inflation adjustment factor predicated on the use of the CPI-U, for all items, not seasonally adjusted, as a sufficiently representative inflationary index and a means to adjust e-Manifest user fees for inflation between the first year and second year of the two-year fee schedules. (Section III.D.3.a and Section III.D.4)

6. *Revenue Recovery Adjuster*—EPA is requesting comment on the inclusion of a revenue recovery adjuster in the proposed fee trajectory methodology and on the



Partnership between 18F GSA

§ 263.21 | Actions: Read the proposal | Write a comment

5. Revise § 263.21 to read as follows:

§ 263.21 Compliance with the manifest.

a. ~~The~~*Except as provided in paragraph (b) of this section, the* transporter must deliver the entire quantity of hazardous waste which he *or she* has accepted from a generator or a transporter to:

Write a comment about § 263.21(a)

★ ★ ★ Show more context ★ ★ ★

b. 1. If the hazardous waste cannot be delivered in accordance with paragraph ~~(a)~~*(a)(1), (a)(2), or (a)(4)* of this section because of an emergency condition other than rejection of the waste by the designated *facility or alternate designated* facility, then the transporter must contact the generator for further ~~directions~~*instructions* and must revise the manifest according to the ~~generator's~~*generator's* instructions.

Write a comment about § 263.21(b)(1)

2. *TRANSPORTERS WITHOUT AGENCY AUTHORITY.*
If *the* hazardous waste is ~~rejected by~~*not delivered to* the *next* designated ~~facility while~~*transporter in accordance with paragraph (a)(3) of this section, and*

Write a comment about § 263.21(b)(2)

WHAT DID WE FIND — NEW COMMENT FORMAT

Topic based v.s. Section/paragraph based

Let’s choose one instruction next time.

Is the pilot easy to use?

We found 4 usability issues to look into.

1. Be more explicit about what the user is looking at.

“Since I’m used to seeing it all at once, *[the whole rule]* **I’m feeling like I’m wondering if I’m looking at the right thing.”**

“Don’t see anything that tells me ‘this is the rule!’”

2. Clarify the difference between saving a response and submitting a comment

3. Better understand user needs around navigation after saving a response.

4. Don’t automatically double space comments.

Is anything missing?

We heard about 4 potential new features that could improve the user's experience.

1. In-progress drafts and multi-session editing

2. Ability to tie responses together

3. Space for general, overarching comments

4. Organization branding and qualifications

Tying it back to our initial questions....

WHAT WE WANTED TO LEARN — EXTERNAL USERS

Will commenters break their comments down and use the pilot? YES!

- If commenters are using the pilot, how does it fit into their drafting/submitting process? **Mostly at the end.**
- Do commenters want to use the pilot, or something similar, in the future? **Generally, yes.**
- Is anything missing or impeding their ability to use the pilot?

WHAT DID WE FIND?

Internal staff

WHAT DID WE FIND — EARLY EXPECTATIONS

1. Indexing comments as they come in will be a huge asset to rulewriters.

2. If commenters break up their comments as asked, it will help keep their comments on track.

We met these expectations!

EXPECTATION: **Indexing comments as they come in will be a huge asset to rulewriters.**

Yes, the comments are easily sortable!

EXPECTATION: Breaking up comments will help keep comments on track.

Yes, asking users to use the comment headings forced them to focus on specific issues.

Is anything missing?

Anonymous comments are hard to work with.

WHAT WE WANTED TO LEARN — INTERNAL STAFF

Will this new comment format make the agency rulewriters' work easier? YES!

- Does this new format, make it easier and faster to sort comments? **Yes.**
- Does this new format change the way people write comments for the better? **Yes.**

WHAT'S NEXT

Can we call this pilot a success?

Yes, but it’s not perfect.

We were able to collect comments during the eManifest comment period for EPA.

Thanks!

Next demo: TBD

Project manager contact: will.sullivan@gsa.gov
Work together with us: github.com/18F/eregs-platform

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