



Reforming U.S. Federal Research Policy

U.S. policy for survey, opinion and market research, as determined and governed by the Office of Management & Budget (OMB), grew out of the 1995 Paperwork Reduction Act (PRA) ([44 U.S. Code § 3501-3531](#)), which referenced the need to “minimize the paperwork burden” for respondents subject to “the collection of information by or for the Federal Government.” This vague statutory mention was turned into a huge regulatory burden ([5 CFR § 1320](#)) on anyone trying to conduct federal survey, opinion and marketing research.

Any federal effort to request or collect data where the same questions are asked to 10 or more respondents generally must obtain OMB clearance. These regulations make it exceptionally challenging and time-consuming to get even a short 1-question survey or a study of only a handful of people approved by OMB, which acts as the super-regulator of federal data collection. Approval usually takes at least 9 months, or more, if ever. This delays or neuters decision-making, which relies on insights from the research.

Most importantly, *OMB’s standards have not changed since 2006.*

The Insights Association’s position: This onerous and archaic approach has not just strangled federal research efforts by trapping them in a pre-Internet mindset; it has wasted taxpayer resources (time and money), hinders federal decision-making, burdens respondents, hurts private-sector research efforts, and severely limits innovation and competition. OMB’s interpretations may make sense when it comes to necessary federal forms, but not for research.

OMB must update federal research policy by:

- (1) streamlining the research approval process (e.g., raising the trigger threshold for review from 10 people contacted, at least for research purposes, to 1,000, or waiving review for regular recurring studies with no material changes);
- (2) accepting modern survey methods and technology, particularly online panels;
- (3) ending the demands for arbitrarily-high response rates (such as 70-80 percent) that waste resources and harass research subjects;
- (4) allowing flexibility in offering and valuing participant incentives, instead of discouraging their use and arbitrarily capping their value;
- (5) increasing competition in the marketplace for the provision of research services to the federal government, which will provide more opportunities for small businesses and innovation;
- (6) recognizing ISO 20252 standards as a mark of quality in research, which will help federal agencies more easily identify trustworthy research partners;
- (7) committing to revisit OMB research standards at least every five years.

For more, see: [Insights Association response to RFI: Deregulation](#). May 12, 2025.