

Regulatory Reduction Guide

Appendix B: Instructions for Completing the Texas Regulatory Impact Matrix (TRIM)

Introduction

The Texas Regulatory Impact Matrix (TRIM) is a standardized documentation tool (Excel workbook) developed by the Texas Regulatory Efficiency Office (TREO) to track and report agency progress toward regulatory reduction as required by Senate Bill 14, 89th Legislature, Regular Session (2025). Part 1 of this appendix provides field-by-field instructions for completing the TRIM Data Entry Worksheet. This data automatically populates the TRIM Dashboard Worksheet. Part 2 of this appendix provides formulas for how each of those auto-populating field calculations are made and describes the manual entry requirements for the TRIM Dashboard Worksheet. The Regulatory Reduction Guide provides detailed definitions and explanations which should be used in conjunction with the information contained in the instructions below.

Part 1: TRIM Data Entry Worksheet

The TRIM Data Entry Worksheet is the primary worksheet. Each row represents one rule under review. The information below describes each column, the field type, whether completion is required, and specific instructions for entry.

1. Rule Citation

- a. Field Type: Text/Link
- b. Required? Required
- c. Description: Official Texas Administrative Code (TAC) citation for the rule being reviewed. The citation should be hyperlinked to the Secretary of State's TAC website.

Reference: <https://www.sos.texas.gov/tac/index.shtml>

- d. Completion Instructions: Enter the citation in standard TAC format: "[Number] TAC §[Section].[Subsection]."

Example: "1 TAC §101.1."

Hyperlink the citation to the rule's TAC page.

2. Rule Heading

- a. Field Type: Text
- b. Required? Required
- c. Description: Official title (heading) of the rule as it appears in the Texas Administrative Code.
- d. Completion Instructions: Copy the exact title from the TAC. This allows reviewers to identify the rule topic.

3. Statutory Authority

- a. Field Type: Text / Link
- b. Required? Required
- c. Description: The specific statute or statutes that mandate or authorize this rule. The citation should be hyperlinked to the Texas Legislature Online (TLO) website. Only the first authority included will be hyperlinked as Excel only allows one hyperlink per cell.

Reference: <https://statutes.capitol.texas.gov/>

- d. Completion Instructions: Enter the exact statutory citation in this format: “[Code Name] §[Section][Subsection].”

Example: “Health & Safety Code §242.037(a).”

List all applicable statutory authorities for the rule. Hyperlink the first citation to TLO.

4. Authority Type

- a. Field Type: Dropdown
- b. Required? Required
- c. Description: Classification of whether the statutory authority is mandatory, permissive, or a combination of both.
- d. Completion Instructions: Select one option from the dropdown:
 - Mandatory – Statute uses “shall,” “must,” or “required.”
 - Permissive – Statute uses “may,” “is authorized to,” or “as necessary.”
 - Mixed – Multiple statutes support the rule with both mandatory and permissive authority.

5. Reduction Categories

- a. Field Type: Multi-select
- b. Required? Optional
- c. Description: Identifies the TREO reduction categories. Multiple categories may apply to a single rule. See the Regulatory Reduction Guide for additional information on these categories.
- d. Completion Instructions: Select all applicable categories from the dropdown:
 - Duplicative – Rule substantially repeats another rule or statute.
 - Obsolete – Rule is outdated or no longer serves its original purpose.
 - Ineffective – Rule fails to achieve its stated regulatory objective.
 - Burdensome – Rule creates compliance burdens disproportionate to its benefit.

Use the Notes / Justification field to briefly explain the basis for any category selected. Avoid assigning categories without a justification.

6. Reduction Strategies

- a. Field Type: Multi-select
- b. Required? Optional
- c. Description: Identifies the TREO reduction strategy. Multiple categories may apply to a single rule. See the Regulatory Reduction Guide for additional information on these strategies.
- d. Completion Instructions: Select all applicable Strategies from the dropdown:
 - Reduce Training – rule change will reduce training requirements.
 - Reduce/Eliminate fees – rule change will result in reduction or elimination of a fee.
 - Reduce Reporting/Recordkeeping – rule change will result in reduced reporting or recordkeeping.

- Reduce Requirements – rule change will reduce, remove, or consolidate regulatory requirements.
- Simplify/Clarify Language – rule change will simplify or clarify rule language
- Cross Reference – rule change will result in incorporation by reference or cross -reference.
- Narrow Applicability – rule change will narrow applicability
- Create Waivers/Exemptions – rule change will create waivers or exemptions to regulatory requirement.
- Eliminate Forms – rule change eliminates form.
- Reduce Form Requirements – rule change will reduce information required by a form.
- Statutory Opportunities – Statutory change must occur prior to the rule change.

Use the Notes / Justification field to briefly explain the basis for any strategy selected. Avoid assigning strategies without a justification.

7. Notes/Justification (Concise)

- a. Field Type: Text
- b. Required? Optional
- c. Description: A brief, plain-language explanation of why the rule has been identified for reduction and the specific reduction category or categories selected.
- d. Completion Instructions: Provide a concise summary explaining:
 - Why this rule qualifies under the selected reduction categories.
 - Any risks, or other considerations that may affect the recommended action.
 - Any additional context TREO reviewers will need to evaluate the rule.

8. Recommended Agency Action

- a. Field Type: Dropdown
- b. Required? Required
- c. Description: The recommended disposition for the rule, reflecting the agreed-upon action between TREO and the agency following collaborative review.
- d. Completion Instructions: Select one option from the dropdown:
 - Repeal - Rule should be fully repealed.
 - Amend - Rule should be modified to reduce burden.
 - Further Review - Additional analysis is needed before a final recommendation can be made.
 - Statutory Opportunity - Reducing or eliminating this rule requires statutory change; TREO may recommend the change to the Legislature.

9. Current Word Count

- a. Field Type: Number
- b. Required? Required

- c. Description: Total word count of the current rule text as it appears in the Texas Administrative Code.
- d. Completion Instructions: Count all words in the rule text, excluding:
 - Adoption history notes
 - Source notes and cross-references
 - Preambles and regulatory preamble text

Use Microsoft Word's word count feature. Enter as a whole number (e.g., 1247).

10. Anticipated Word Count

- a. Field Type: Number
- b. Required? Conditional
- c. Description: The estimated total word count of the rule after the recommended action is implemented. Required for rules recommended for Amendment.
- d. Completion Instructions: Complete this field as follows:
 - Repeal: Enter 0.
 - Amend: Enter the estimated word count of the revised rule text after implementation.
 - Further Review or Statutory Opportunity: Leave blank until a final action is determined.

This field supports calculation of the Word Count Delta and overall reduction metrics.

11. Word Count Delta

- a. Field Type: Calculated
- b. Required? Auto
- c. Description: Automatically calculated field showing the net reduction in words resulting from the recommended action.

Formula: `=IF (AND (H [row] <> "", I [row] <> "") , H [row] - I [row] , "")`

- d. Completion Instructions: This field is calculated automatically. Do not enter a value manually.

Interpretation:

- Repeal: Delta equals the full Current Word Count (rule entirely removed).
- Amend: Delta equals Current Word Count minus Anticipated Word Count.
- Blank: Anticipated Word Count has not yet been entered.

This value contributes to agency-level and TREO-wide reduction totals displayed on the Dashboard.

12. Register Publication Date

- a. Field Type: Date
- b. Required? Conditional
- c. Description: The date the proposed rule change is published in the Texas Register. Required once the proposed rule has been filed for publication.

- d. Completion Instructions: Enter the date in MM/DD/YYYY format when the proposed rule is published in the Texas Register. Leave blank until the proposed rule is filed. This date initiates the formal rulemaking timeline.

13. Rule Effective Date

- a. Field Type: Date
- b. Required? Conditional
- c. Description: The effective date of the final rule change after adoption. Required once the adopted rule becomes effective.
- d. Completion Instructions: Enter the date in MM/DD/YYYY format when the adopted rule change becomes effective. Leave blank until the adopted rule is effective.

Part 2: TRIM Dashboard Worksheet

The TRIM Dashboard Worksheet is a summary that automatically aggregates data from the TRIM Data Entry Worksheet. It provides TREO and agency leadership with a high-level snapshot of regulatory reduction progress, including rule counts, word count reductions, and a breakdown by recommended action. Agencies should only enter values for fields requiring manual entry as described below. All other fields are calculated automatically from the TRIM data.

1. Agency

- a. Location: B4
- b. Description: Name of the agency whose TRIM data is reflected in this workbook. This is a manually entered field completed by the agency before submission to TREO.
- c. Excel Formula/Source: Manual entry - no formula. Enter agency's unabbreviated name.

2. Current Total Regulations

- a. Location: B7
- b. Description: Total number of agency rules.
- c. Excel Formula/Source: Manual entry - no formula. Enter the total count of all agency rules. This figure serves as the baseline denominator for all percentage calculations on the Dashboard.

3. Current Total Word Count (All Rules)

- a. Location: C7
- b. Description: Aggregate word count across all agency rules.
- c. Excel Formula/Source: Manual entry - no formula. For assistance on this determination, consult with your TREO reviewer.

4. Recommended for Repeal (# Rules)

- a. Location: B8
- b. Description: Count of rules in the TRIM sheet for which the Recommended Agency Action is "Repeal."
- c. Excel Formula/Source:

Formula: `=COUNTIF (TRIM!H5:H20002, "Repeal")`

5. Recommended for Repeal (Words)

- a. Location: C8
- b. Description: Sum of Word Count Delta for all rules recommended for Repeal. Represents the total words that will be eliminated from the TAC if all repeal actions are completed.
- c. Excel Formula/Source:

Formula: `=SUMIF (TRIM!H5:H20002, "Repeal", TRIM!K5:K20002)`

6. Recommended for Amendment (# Rules)

- a. Location: B9
- b. Description: Count of rules in the TRIM sheet for which the Recommended Agency Action is "Amend."
- c. Excel Formula/Source:

Formula: `=COUNTIF (TRIM!H5:H20002, "Amend")`

7. Recommended for Amendment (Words)

- a. Location: C9
- b. Description: Sum of Word Count Delta for all rules recommended for Amendment. Represents the net word reduction that will result if all amendment actions are completed.
- c. Excel Formula/Source:

Formula: `=SUMIF (TRIM!H5:H20002, "Amend", TRIM!K5:K20002)`

8. Statutory Opportunity (# Rules)

- a. Location: B10
- b. Description: Count of rules in the TRIM sheet for which the Recommended Agency Action is “Statutory Opportunity.” These are rules that require statutory change before they can be reduced or eliminated.
- c. Excel Formula/Source:

Formula: `=COUNTIF (TRIM!H5:H20002, "Statutory Opportunity")`

9. Statutory Opportunity (Words)

- a. Location: C10
- b. Description: Sum of Word Count Delta for all rules designated as Statutory Opportunity.
- c. Excel Formula/Source:

Formula: `=SUMIF (TRIM!H5:H20002, "Statutory Opportunity", TRIM!K5:K20002)`

10. Total Proposed Changes (# Rules)

- a. Location: B11
- b. Description: Combined count of all rules recommended for Repeal, Amendment, or Statutory Opportunity. Excludes rules with a status of “Further Review.”
- c. Excel Formula/Source:

Formula: `=COUNTIF (TRIM!H5:H20002, "Amend")
+COUNTIF (TRIM!H5:H20002, "Repeal")
+COUNTIF (TRIM!H5:H20002, " Statutory Opportunity")`

11. Total Proposed Changes (Words)

- a. Location: C11
- b. Description: Combined Word Count Delta for all rules recommended for Repeal, Amendment, or Statutory Opportunity.
- c. Excel Formula/Source:

Formula: `=SUMIF (TRIM!H5:H20002, "Amend", TRIM!K5:K20002)
+SUMIF (TRIM!H5:H20002, "Repeal", TRIM!K5:K20002)
+SUMIF (TRIM!H5:H20002, " Statutory Opportunity ", TRIM!K5:K20002)`

12. Estimated Agency Total After Changes (# Rules)

- a. Location: B12

- b. Description: Projected total number of rules remaining after all Repeal actions are completed. Amendments reduce word count but do not reduce rule count.
- c. Excel Formula/Source:

Formula: `=B7-COUNTIF (TRIM!H5:H20002, "Repeal")`

13. Estimated Agency Total After Changes (Words)

- a. Location: C12
- b. Description: Projected total word count remaining in the TAC after all Repeal, Amendment, and Statutory Opportunity actions are fully implemented.
- c. Excel Formula/Source:

Formula: `=C7-SUMIF (TRIM!H5:H20002, "Repeal", TRIM!K5:K20002)
-SUMIF (TRIM!H5:H20002, "Amend", TRIM!K5:K20002)
-SUMIF (TRIM!H5:H20002, " Statutory Opportunity", TRIM!K5:K20002)`

14. Total Cost Savings Estimate

- a. Location: B13
- b. Description: Estimated aggregate compliance cost savings resulting from all proposed regulatory changes. This is a manually entered field and should be based on agency cost analysis or TREO's cost estimation methodology.
- c. Excel Formula/Source: Manual entry - no formula. Enter as a dollar value. Agencies should document the methodology used to calculate this figure in the Notes sheet.

15. Recommendation % - No Change

- a. Location: G7
- b. Description: Percentage of total rules with no recommended reduction action (i.e., rules not recommended for Repeal, Amendment, or Statutory Opportunity, and not pending Further Review).
- c. Excel Formula/Source:

Formula: `=(B7-B8-B9-COUNTIF (TRIM!H5:H20002, "Further Review"))/B7`

16. Recommendation Label – Repeal

- a. Location: F8
- b. Description: Formatted label combining the recommendation name and percentage for use in charts and visual summaries on the Dashboard.
- c. Excel Formula/Source:

Formula: `=E8 & " - " & TEXT (G8, "0%")`

17. Recommendation % - Repeal

- a. Location: G8
- b. Description: Percentage of total rules recommended for Repeal.
- c. Excel Formula/Source:

Formula: `=B8/B7`

18. Recommendation % - Amend

- a. Location: G9
- b. Description: Percentage of total rules recommended for Amendment.
- c. Excel Formula/Source:

Formula: `=B9/B7`

19. Recommendation % - Statutory Opportunity

- a. Location: G10
- b. Description: Percentage of total rules designated as Statutory Opportunity.
- c. Excel Formula/Source:

Formula: `=B10/B7`

Questions and Contacts

For questions, contact TREO at treo@gov.texas.gov.