



9110-9B

DEPARTMENT OF HOMELAND SECURITY

[Docket Number DHS-2020-0019]

Agency Information Collection Activities: Generic Clearance for Improving Customer Experience (OMB Circular A-11, Section 280 Implementation)

AGENCY: Department of Homeland Security (DHS).

ACTION: 60-Day Notice and request for comments; New Collection, 1601-NEW.

SUMMARY: The Department of Homeland Security (DHS) as part of its continuing effort to reduce paperwork and respondent burden, is announcing an opportunity for public comment on a new proposed collection of information by the Agency. Under the Paperwork Reduction Act of 1995 (PRA), Federal Agencies are required to publish notice in the *Federal Register* concerning each proposed collection of information, and to allow 60 days for public comment in response to the notice. This notice solicits comments on new collection proposed by the Agency.

DATES: Comments are encouraged and will be accepted until **[INSERT DATE 60 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER]**. This process is conducted in accordance with 5 CFR 1320.1.

ADDRESSES: You may submit comments, identified by docket number Docket Number DHS-2020-0019, at:

- Federal eRulemaking Portal: <http://www.regulations.gov>. Please follow the instructions for submitting comments.

Instructions: All submissions received must include the agency name and docket number Docket Number DHS-2020-0019. All comments received will be posted without change

to <http://www.regulations.gov>, including any personal information provided.

Docket: For access to the docket to read background documents or comments received, go to <http://www.regulations.gov>.

SUPPLEMENTARY INFORMATION:

On September 11, 1993, President Clinton issued Executive Order 12862, “Setting Customer Service Standards” which clearly define his vision that the Federal agencies will put the people first. Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. Section 1(b) of Executive Order 12862 requires government agencies to “survey customers to determine the kind and quality of services they want and their level of satisfaction with existing services” and Section 1(e) requires agencies “survey front-line employees on barriers to, and ideas for, matching the best in business.”

On March 30, 2016, President Obama established the Core Federal Services Council, which again emphasized the need to deliver world-class customer service to the American people. The Council, composed of the major high-volume, high-impact Federal programs that provide transactional services directly to the public, were encouraged “to improve the customer experience by using public and private sector management best practices, such as conducting self-assessments and journey mapping, collecting transactional feedback data, and sharing such data with frontline and other staff.”

In March 2018, the Administration of President Trump launched the President’s Management Agenda (PMA) and established new Cross-Agency Priority (CAP) Goals. Excellent service was established as a core component of the mission, service, stewardship model that frames the entire PMA, embedding a customer-focused approach

in all of the PMA's initiatives. This model was also included in the 2018 update of the Federal Performance Framework in Circular A-11, ensuring 'excellent service' as a focus in future agency strategic planning efforts. The PMA included a CAP Goal on Improving Customer Experience with Federal Services, with a primary strategy to drive improvements within 25 of the nation's highest impact programs. This effort is supported by an interagency team and guidance in Circular A-11 requiring the collection of customer feedback data and increasing the use of industry best practices to conduct customer research.

These Presidential actions and requirements establish an ongoing process of collecting customer insights and using them to improve services. This new request will enable the Department of Homeland Security (hereafter "the Agency") to act in accordance with OMB Circular A-11 Section 280 to ultimately transform the experience of its customers to improve both efficiency and mission delivery, and increase accountability by communicating about these efforts with the public.

The Agency will collect, analyze, and interpret information gathered through this generic clearance to identify services' accessibility, navigation, and use by customers, and make improvements in service delivery based on customer insights gathered through developing an understanding of the user experience interacting with Government.

For the purposes of this request, "customers" are individuals, businesses, and organizations that interact with a Federal Government agency or program, either directly or via a Federal contractor.

"Service delivery" or "services" refers to the multitude of diverse interactions between a customer and Federal agency such as applying for a benefit or loan, receiving a service such as healthcare or small business counseling, requesting a document such as a passport or social security card, complying with a rule or regulation such as filing taxes or declaring goods, utilizing resources such as a park or historical site, or seeking information such as public health or consumer protection notices.

Under this request, three types of activities will be conducted to generate customer insights:

Customer Research (E.g., User Persona and Journey Map Development): A critical first component of understanding customer experience is to develop customer personas and journey maps. This process enables the Agency to more deeply understand the customer segments they serve and to organize the processes customers interact with throughout their engagement with the Federal entity to accomplish a task or meet a need. In order to adequately capture the perspective of the customer and the barriers or supports that exist as they navigate these journeys, it is necessary to directly interact with customers rather than relying solely upon the Agency's stated policy of how a process should work or employees' interpretation of how services are delivered. This can occur through a variety of information collection mechanisms that include focus groups, individual intercept interviews at a service site, shadowing a user as they navigate a Federal service and documenting their reactions and frustrations, customer free-response comment cards, or informal small discussion groups.

Regardless of the format, the Agency will apply Human Centered Design (HCD) Discovery methods to generate personas and journey maps, ultimately identifying customer insights. An approach to recruiting participants, resources for preparing and structuring interviews, and a consent form for interviewees can be found at <https://www.gsa.gov/cdnstatic/HCD-Discovery-Guide-Interagency-v12-1.pdf>. This document is also included in the package.

Insights documented, summarized and presented in customer personas and journey maps can then be shared across the program, the Agency, other Federal, State, and Local government stakeholders and even with the public to validate and discuss common themes identified. These products can be used as “indicator lights” for where more rigorous qualitative and quantitative research can be conducted to improve Federal service delivery.

Publicly shared personas and journey maps will include language that qualifies their use (see question #16), and high-level, non-identifying descriptive statistics of the population(s) interviewed to develop it (ex. “25 Service members that transitioned to civilian employment within the last decade, 14 female, 11 male, 21 enlisted and 4 officers) to ensure that the perspective represented is understood. Quotes or insights will never be associated with an actual individual unless they have signed a release form (see link above for template) and this was included in the specific collection request.

Customer Feedback (Satisfaction Survey): Surveys to be considered under this generic clearance will only include those surveys modeled on the OMB Circular A-11 CX Feedback survey to improve customer service by collecting feedback at a specific point during a customer journey. This could include upon submitting a form online on a

Federal website, speaking with a call center representative, paying off a loan, or visiting a Federal service center.

In an effort to develop comparable, government-wide scores that will enable cross-agency or industry benchmarking (when relevant) and a general indication of an agency's overall customer satisfaction, OMB Circular A-11 Section 280 requires high impact services to measure their touchpoint/transactional performance in as a real-time manner as possible, with respect to satisfaction and confidence/trust using the following questions, without modification. Responses will typically be assessed on a 5-point Likert scale (1 (strongly disagree) to 5 (strongly agree)). These questions align to drivers of experience developed in consultation with leading organizations in customer experience both in the private sector and industry groups that study the most critical drivers of customer experience.

- 5 point Likert scale: *I am satisfied with the service I received from [Program/Service name].*
- 5 point Likert scale: *This interaction increased my confidence in [Program/Service name]. OR I trust [Agency/Program/Service name] to fulfill our country's commitment to [relevant population].*
- Free response: *Any additional feedback on your scores above?*
- 5 point Likert scale: *My need was addressed OR My issue was resolved. OR I found what I was looking for.*
- 5 point Likert scale: *It was easy to complete what I needed to do.*
- 5 point Likert scale: *It took a reasonable amount of time to do what I needed to do.*

- 5 point Likert scale: *I was treated fairly.*
- 5 point Likert scale: *Employees I interacted with were helpful.*
- Free response: *Any additional feedback for [Program/Service name]?*

The surveys shall include no more than 15 questions in total. The Agency may add a few additional questions to those listed above to clarify type of service received, inquiry type, service center location, or other program-specific questions that can help program managers to filter and make use of the feedback data.

As part of the Customer Experience CAP goal's strategy to increase transparency to drive accountability, the feedback data collected through the A-11 Standard Feedback survey is meant to be shared with the public. This collection is part of the government-wide effort to embed standardized customer metrics within high-impact programs to create government-wide performance dashboards. Data collected from the questions listed above will be submitted by the Agency to OMB at a minimum quarterly for updating of customer experience dashboards on performance.gov. This dashboard will also include the total volume of customers that passed through the transaction point at which the survey was offered, the number of customers the survey was presented to, the number of responses, and the mode of presentation and response (online survey, in-person, post-call touchtone, mobile, email). This will help to qualify the data's representation by showing both the response rate and total number of actual responses.

User Testing of Services and Digital Products: Agencies should continually review, update and refine their service delivery, including communication materials, processes, supporting reference materials, and digital products associated with a Federal program. This often requires "field testing" program informational materials, process updates,

forms, or digital products (such as websites or mobile applications) by interacting with past, existing, or future customers and soliciting feedback. These activities can include cognitive laboratory studies, such as those used to refine questions on a program form to ensure clarity, demo kiosks at a service center where customers can provide informal feedback while waiting for a service, or more formally scheduled in-person observation testing (e.g., website or software usability tests). These information collection activities are more specific than broad customer research and related to a particular artifact / product of a Federal program. As such, there will be a more structured interview / set of questions than more open-ended customer research. Findings from these activities are meant to support the design and implementation of Federal program services and digital products, and may only be shared in an anonymized / in aggregate if a particular insight is useful to include as part of a customer persona, journey map, or common lesson learned for improving service delivery.

The Agency will only submit under this generic clearance if it meets the following conditions:

- The collections are voluntary;
- The collections are low-burden for respondents (based on considerations of total burden hours or burden-hours per respondent) and are low-cost for both the respondents and the Federal Government;
- The collections are non-controversial and do not raise issues of concern to other Federal agencies;

- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future;
- Personally identifiable information (PII) is collected only to the extent necessary and is not retained;
- Information gathered is intended to be used for general service improvement and program management purposes
- Upon agreement between OMB and the agency all or a subset of information may be released as part of A-11, Section 280 requirements only on performance.gov. Additionally, summaries of customer research and user testing activities may be included in public-facing customer journey maps and summaries.
- Additional release of data must be done coordinated with OMB.

This clearance will help the Agency to establish a process where customer experience is regularly monitored and measured. The results will assist the Agency in the planning and decision-making processes to improve the quality of the Agency's products and services.

Results from feedback activities and surveys will be used to measure against established baseline standards and for measuring the Agency's progress toward defined goals.

There are neither legal nor technical obstacles to the use of technology in these information collection activities. The determination to use technology, and which technology to use, will be based on the type of information collected and the utility and

the availability of specific technology to each respondent in a proposed customer research activity or feedback survey.

The Agency will work to ensure the streamlining of all customer research and feedback surveys under this clearance. The Agency will also work to reduce existing customer feedback surveys and questions into alignment with the A-11 Standard CX Feedback survey as part of a coordinated Agency-wide customer program. The information to be supplied on these surveys will not be duplicated on any other information collection.

The information collected in these surveys will represent the minimum burden necessary to evaluate customer experience with the Agency's programs and processes. The Agency will minimize the burden on respondents by sampling as appropriate, asking for readily available information, and using short, easy-to-complete information collection instruments.

Without regular mechanisms for collecting and generating customer insights, the Agency is not able to provide the public with the highest level of service. These activities will be coordinated to ensure that most individual respondents will not be asked to respond to more than one survey instrument per transaction or to participate in more than one qualitative feedback or testing activity.

These surveys will be consistent with all the guidelines in 5 CFR 1320.5, especially those provisions in subsection (g) which require that a statistical survey be designed to produce results that can be generalized to the universe of study. There are no special circumstances that would cause this information collection to be conducted in an unusual or intrusive manner. All participation will be voluntary. Should the Agency need to

deviate from the requirements outlined in 5 CFR 1320, individual justification will be provided to OMB on a case-by-case basis.

No attempt will be made to generalize the findings from these three groups of activities to be nationally representative or statistically valid. They are meant to compliment and help to contextualize performance and evaluation data as part of a three-pronged approach to understanding Federal program implementation and opportunities for improvement (Performance, Evaluation, and “Feedback” data¹).

Customer Research: Insights gleaned from qualitative customer research may be presented publicly in the format of a conceptual user persona or customer journey map. Customer research can take anywhere from 6 weeks for a short sprint to a full fiscal year, depending on the specific project. The Agency expects most journey mapping efforts to last approximately 6 months, with a user persona and journey maps ready for feedback (both from internal and external to government stakeholders) within one month of completing customer research.

Publicly available Journey maps will include specific language to contextualize their use and will be included in specific requests. This language can include something like:

What should I know about journey maps?

Journey maps are living documents—continually refined and revisited. There is never a “final” version, and these maps are meant to serve as a summary of the voices of actual customers of U.S. Government services. A map may not precisely document the way a Government program is meant to be navigated, accessed, or used. It might not capture every government program or resource available to a customer segment.

However, it is the product of a qualitative research approach to gather insights from customers' actual experiences. These findings can help us to identify areas for high-impact improvements across delivery channels and organizational silos.

Customer Feedback: Once touchpoint surveys are implemented at transaction points along the customer journey interacting with Federal services, data from the A-11 Standard CX Feedback survey will be submitted to OMB quarterly for review and publication in a summary dashboard on performance.gov.

This data will include:

- Specific transaction point at which the survey was administered
- Total volume of customers that interacted at this transaction point during the given quarter
- Total volume of customers that were presented the survey
- Total number of customers who completed the survey
- Mode(s) of collection (ex. online, over mobile, over the phone, paper form)
- Specific survey instrument that shows the Agency's wording of standard A-11 CX Feedback survey
- Distribution of the responses across the 5 point Likert scale for each of the standard questions

The purpose of collecting volume and response numbers is to share customer feedback measures in context of the response rate and total volume of responses to qualify interpretation of the CX feedback data.

Testing of Services and Digital Products: Similar to Customer Research, this can range

from a short two-day rapid feedback from users within an Agile product development sprint or longer effort to gather more extensive feedback from multiple physical locations.

DHS is particularly interested in comments which:

1. Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;
2. Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
3. Enhance the quality, utility, and clarity of the information to be collected; and
4. Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses.

ANALYSIS:

AGENCY: Department of Homeland Security DHS

Title: Generic Clearance for Improving Customer Experience (OMB Circular A-11, Section 280 Implementation)

OMB Number: 1601-NEW

Frequency: On Occasion

Affected Public: Individuals

Number of Respondents: 2,001,550

Estimated Time Per Respondent: 3 mins or up to 2 hours

Total Burden Hours: 101,125

Dated: May 12, 2020.

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