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MITRE Response to OMB's RFI on Improving Customer Experience

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For additional information about this response, please contact:

Duane Blackburn
Center for Data-Driven Policy
The MITRE Corporation
7596 Colshire Drive
McLean, VA 22102-7539

policy@mitre.org
(434) 964-5023

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About MITRE

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MITRE has conducted extensive research on how to apply leading private sector practices for improving customer experience and service delivery to the federal sector. During this time, leading practices evolved to integrate agile, data analytics, and systems thinking to strengthen the evidence-based rigor of human-centered design methods. Throughout our research, MITRE has prototyped and piloted the specific methods in several federal agencies to inform the customer experience and service delivery (CX/SD) insights cycle and resulting framework.

Discussion and Recommendations

The President's Management Agenda (PMA)¹ Vision Priority #2 and Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in the Government (EO 14058)² provide a clear demand signal to apply innovation to improving CX/SD. The PMA Vision and EO differ from past initiatives in that they target: 1) designing and building services for key life experiences that cut across agencies, 2) measuring performance in terms of customer results and public outcomes, and 3) applying evidence-based, systematic, and collaborative methods.

EO 14058 signals a departure from the previous focus on collecting customer feedback³ by calling for agencies to use a wide range of data sources and methods, including experiential data, ethnographic and observational user research, human-centered design activities, and the analysis of operational and administrative data (EO 14058, Sec. 6 (d) Ongoing Accountability for Federal Service Delivery) to systematically identify and resolve the root causes of customer experience challenges (EO 14058, Sec. 2 Policy.) It also requires the heads of agencies to integrate activities to improve CX into their agency strategic plans, Agency Performance Plans, agency priority goals, and individual performance plans of all senior executives and relevant senior employees. EO 14058 repositions CX/SD as a whole-of-agency, whole-of-government endeavor that is the

¹ The Biden-Harris Management Agenda Vision. 2021. The White House, https://assets.performance.gov/PMA/Biden-Harris_Management_Agenda_Vision_11-18.pdf

² Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government. 2021. The White House, <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/12/13/executive-order-on-transforming-federal-customer-experience-and-service-delivery-to-rebuild-trust-in-government/>. Last accessed March 9, 2022.

³ OMB Circular No. A-11, Preparation, Submission and Execution of the Budget § 280.7. 2021. Office of Management and Budget, <https://www.whitehouse.gov/wp-content/uploads/2018/06/a11.pdf>. Section 280.10 prescribes specific questions that High-Impact Service Providers must use in customer feedback surveys to collect and report data.

collective, cross-functional responsibility of senior executives to improve by applying methods that are systematic, integrated, evidence-driven, and human-centered. This repositioning of CX/SD makes the Evidence Act framework⁴ a more relevant source of guidance for conducting the core CX functions.

Although agencies are collecting the required customer feedback, they have difficulty using the data to generate the insights needed to systematically improve service delivery. This challenge results from the lack of a more strategic evidence-building approach to generating and using actionable insights and measuring performance in terms of customer and public outcomes. Federal executives and managers need to work collaboratively to apply the following guidance from M-21-27 to their CX program:

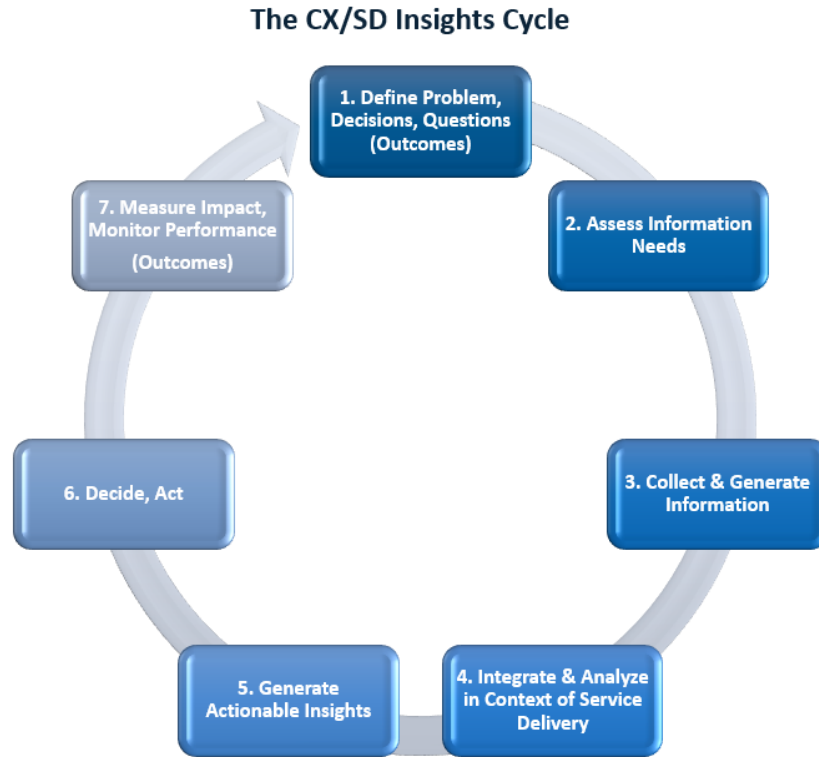
- Think about how the evidence may be used and how its use may benefit programmatic, management, regulatory, or operational decision making with the agency and beyond.
- Recognize that answering a specific question may require multi-faceted, mixed-method approaches, which will entail engaging a range of staff and expertise.
- Use the most rigorous methods that are appropriate to answer the specific question(s) being asked given considerations like timeline, feasibility, equity, and resources.
- Design data collection activities to generate usable information.⁵

Based on case study-based research applying leading private sector practices to the federal sector, MITRE has developed a CX Measures framework to help federal leaders generate *actionable insights* from a wide range of CX/SD data sources and methods. The CX/SD Insights Cycle (Figure 1) illustrates the stages of applying this framework, which align to the Evidence Act guidance, but with the critical addition of identifying and using existing information when assessing information needs and gaps.⁶

⁴ This framework consists of multiple pieces: Pub. L. No. 115-435, 132 Stat. 5529 (2019), available at <https://www.congress.gov/115/plaws/publ435/PLAW115publ435.pdf>; Office of Mgmt. & Budget, Exec. Office of the President, OMB M-19-23, *Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance* (2019), available at <https://www.whitehouse.gov/wp-content/uploads/2019/07/M-19-23.pdf>; Office of Mgmt. & Budget, Exec. Office of the President, OMB M-20-12, *Phase 4 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Program Evaluation Standards and Practices* (2020), available at <https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-12.pdf>; See Office of Mgmt. & Budget, Exec. Office of the President, OMB M-21-27, *Evidence-Based Policymaking: Learning Agendas and Annual Evaluation Plans* (2021), available at <https://www.whitehouse.gov/wp-content/uploads/2021/06/M-21-27.pdf>.

⁵ M-21-27, *Evidence-Based Policymaking: Learning Agendas and Annual Evaluation Plans*. 2021. Office of Management and Budget, <https://www.whitehouse.gov/wp-content/uploads/2021/06/M-21-27.pdf>.

⁶ D. Hubbard. *How to measure anything: finding the value of "intangibles" in business*. 2014. John Wiley & Sons. p. 31.



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Figure 1: The CX/SD Insights Cycle: From Metrics to Actionable Insights to Outcomes

The effective use of five distinct service design artifacts throughout the CX/SD Insights Cycle fosters alignment, collaboration, and generation of data-driven insights throughout the process:

1. **A Service Domain Model** – to define the scope, boundaries, key elements (e.g., people, process, technologies, policies) of the service delivery system and their relationships. This initial “big picture” view is crucial to building the conceptual scaffolding that enables stakeholders to view services at scale and to identify and prioritize the key pain points and opportunities.⁷
2. **Customer/Stakeholder Assessment** – to identify and assess the categories of customers/stakeholders that exist in any service delivery environment: end users, brokers/intermediaries, employees, partners/suppliers, both internal and external investors/appropriators, and oversight organizations.
3. **Behavioral Personas** – to summarize and quantify the full range of customer needs, attributes (physical and situational), attitudes, and perceptions to inform design priorities and decisions to ensure equity, transparency, effectiveness, and adoption of services.
4. **Customer Journey Maps** – to define the core stages of the journey from the customer’s perspective, based on their steps, tasks (or “jobs to be done”⁸), and desired outcomes.

⁷ J. Kalbach. Mapping Experiences, 2nd Edition. 2021. O’Reilly Media. p. 20-21.

⁸ J. Kalbach, The Jobs to be Done. 2020. J. (2020). Two Waves Books. “Jobs to be done” is a theory and construct for viewing the service delivery process from the customer’s perspective.

5. **Service Blueprints** – to create a detailed system view of the flow of delivering value through the customer and organization interactions. This detailed view identifies all the interdependent components of the service delivery system.

Applying this CX/SD Insights Cycle and set of service design artifacts, MITRE is researching and developing service blueprints for integrated benefits delivery for a specific life event (life event to be determined). These blueprints will offer remedies to key pain points in current customer journeys as well as opportunities to integrate operational processes and technologies across benefits programs in the pre-award phase to make the customer and administrator experience more seamless.

MITRE is scoping a proof of concept that will establish an information architecture for integrated benefits delivery to answer the following questions:

- For a specific life event, what data elements and business processes are common across relevant benefits programs and thus ripe for integration?
- What back-end administrative systems and data integration are needed to enable seamless cross-program customer and administrator experiences?
- What architectures, incentives, and reforms (legal, policy, data, etc.) are needed to enable secure and swift storage and exchange of authoritative personally identifiable information?
- What performance metrics should be used to determine the integrated model's efficacy?

MITRE is currently connecting with government, private sector, and non-profit entities involved in benefits administration to understand the landscape of stakeholders working on integrating benefits delivery for a specific life event and to explore collaboration and/or partnership opportunities.

Ensuring Equity, Transparency, and Trust

Overarching customer experience would benefit from more concrete details that increase government transparency, for example, through the release of ethics and equity scorecards (similar to FITARA scorecards) of how tenets are applied in collected data. Regular scorecards will help establish a baseline and identify potential biases and inequities in the analytics efforts and government services. Use of tools such as MITRE's Framework for Assessing Equity in Federal Programs and Policies⁹ is a resource that could be a starting point to measure government performance for equity. (Note that the Federal Data Ethics Framework does not sufficiently address vulnerability of certain populations. Its recommendations need to expand beyond data management best practices statements and be more specific to improving the government's ability to create/collect, distribute, analyze, disseminate, and use results ethically.)

Agencies should incorporate more data collection metrics on historically marginalized populations. As an example, the government today fails to measure the number of people covered under the Americans with Disabilities Act (ADA) that are let go during the probationary

⁹ A Framework for Assessing Equity in Federal Programs and Policies. 2021. MITRE, <https://www.mitre.org/sites/default/files/publications/pr-21-1292-a-framework-for-assessing-equity-in-federal-programs-and-policy.pdf>

hiring period. Nor does it provide data on whether promotion percentages over time for these individuals track with the percentages of non-ADA workers.

Relative to best practices for the intersection of data ethics and diversity, equity, inclusion, and accessibility:

- Federal agencies should partner with state and local agencies to integrate local data (which is often at higher granularity for key demographic variables like race, ethnicity, gender, disability, and income) and law enforcement data (such as hate incidents) that are not always available at the federal level. Such local and regional partnerships take advantage of new data collection methods already being leveraged by resident communities. In addition, federal agencies should partner with advocacy groups for equity and accessibility, such as the American Civil Liberties Union and the National Federation for the Blind.
- To measure equity in government service delivery, collected and published data should include a wide set of demographics, be in multiple formats and languages, and include metadata to provide context. When agencies collect and publish data, they should more exactly state what is contained in a dataset, what is missing, and known unknowns. Furthermore, agencies should consider biases that may be introduced by compliance restrictions.
- To improve trust and transparency, federal agencies can improve stakeholder engagement throughout the CX/SD Insights Cycle. The Chief Data Officers Council or the Office of Management and Budget (OMB) should require researchers and agencies to collaboratively define the problem space and identify the high-priority questions to answer; reduce respondent burden by identifying and assessing existing information; provide transparency on data collection methods, rules for decision making, designs of analytic products and privacy treatments; and make training data and models available for scrutiny. Fostering repeatability and reproducibility of data processes would provide greater transparency, leading to improved trust. Researchers and agencies should systematically leverage data disclosure avoidance approaches such as differential privacy (e.g., as used by the 2020 Census).

In summary, MITRE views the proposed information collection as both necessary and critical to informing equitable, effective design of integrated services and benefits oriented to important life events that fall outside the scope of a single agency's programs. MITRE recommends that OMB apply a strategic, evidence-building approach to its planning and execution and use service design artifacts to engage and align stakeholders in conceptualizing the cross-agency services at scale.