

Comment from Angelo Frigo in response to Request for Information for *Identifying and Reducing Burdens in Administrative Processes*
February 16, 2023

Comment on Identifying and Reducing Burdens in Administrative Processes

To paraphrase, ACUS is examining how/methods/strategies to recommend best practices to agencies. (Bold emphasis is mine)

- “**How** agencies are using and might better use customer service methods to improve administrative programs and procedures”
- “**Methods**, such as public engagement and data analysis, that agencies can use to identify unnecessary burdens that members of the public face when they engage with administrative programs or participate in administrative processes”
- “**Strategies** for reducing unnecessary burdens, such as streamlining processes and digitizing services”

I worked closely and personally with CX HISP leaders for two years as a Presidential Innovation Fellow at OMB. Here are my thoughts:

1. The ‘how’ is not the problem

Very few, if any, CX leaders in agencies lack the ‘how’ in terms of methods or strategies. The reason they are not using any methods and strategies that will be identified by this work is not because they don’t know about them. So, the problem here rests outside the spotlight of this ACUS initiative. I suggest opening up the focus here to ask instead: why are burdens not being reduced? That’s the question I started to ask and then worked to answer over my two years.

2. The problem is that burdens are not reported, measured, or materially valued

No agencies measure burden effectively, at least not beyond PRA paperwork burdens which are a small and insignificant fraction of public burdens (outside of perhaps the IRS and CMS, which I had a limited view into). Few agencies include burdens in their performance reporting in any material way and those that do report on paperwork burdens.

3. Agencies are primarily directed to be more efficient with money

Agencies are directed to save tax dollars. Reducing waste, fraud, and abuse to increase program integrity and reduce administrative costs is a good thing.

4. There is no current burden goal/objective that can stand up to these efficiency objectives

Efforts to improve integrity or efficiency often increase burdens by pushing costs off an agencies balance sheet (see the former CAP goals “shifting from low value to high value work” and “getting payments right”, which both appear to have increased burdens). When executive decisions are made on what to do, efficiency wins. If an agency can increase program integrity by asking the public for more information or requiring more evidence – burdens go up. When CX leaders try to get their agencies to reduce burdens but that requires an increase in spending or a reduction in integrity – even if slight – it almost always loses.

5. Technology modernization is reducing burdens in many ways, but not to reduce burdens

The main wins in improving public interactions with government over the past decade have been through service digitization which have reduced admin costs and public burdens. But ask yourself the hypothetical – if those efforts had increased admin costs would they have been

implemented? Likely no. If they had not reduced public burden but still reduced admin costs, likely yes.

6. Burdens need to be legitimized by measuring in dollars

I worked with the Office of Financial Management at OMB exploring the relationship between Integrity and Burden – that work remains unresolved because they can't incorporate burden into their work if burden does not have financial value. Burden is measured in time. Time can be converted to dollars in lost wages, lost productivity, etc. When taken as a whole, the burdens on the public amount to trillions of dollars worth of time that could be used on other pursuits. In these terms, aggregate burdens are of domestic economic importance.

7. We conducted a pilot on the WIC program and the results were illuminating

A small team estimated the true burden of learning about, applying for, and using the WIC program. The burdens were 10-50x those estimated by the PRA process. Then we conservatively estimated the costs of that time by multiplying by the minimum wage and we added those costs onto the WIC public financial reporting forms. What did we learn? That the WIC program is a terribly way to administer those public benefits. It would be less costly to the nation to give those public benefits away to all mothers, not just the 50% that qualify, and eliminate most of those administrative and burden costs and spend it on benefits (baby formula and education) instead (which lo and behold is how all other modern democracies do it). But this is scary to WIC administrators. They don't want to reduce these burdens. Reducing these burdens is reducing jobs and their program is already scrutinized by conservatives in Congress. Better to stay under the radar.

8. OMB is where ACUS should be focused, if not Congress

Three parts of OMB are partly responsible for this: OIRA, Financial Management, and Performance Management. But because none are squarely responsible it falls between the cracks. OIRA manages the PRA and wrote a memorandum last year that suggested in a "maybe you should try..." way that agencies should measure burdens more holistically rather than just paperwork. But unless Performance Management gets behind that with real force then it won't happen. And if those burdens are not integrated into financial management, then the decisions to implement burden reduction efforts will continue to meet their demise when a choice must be made versus a competing initiative that will drive financial value.

9. If agencies were required to report on the economic impact of burdens, the practices to do so would be enacted without the need for outside recommendations

Again, the practices and procedures of identifying and reducing burdens are commonplace. Agency teams know how talk to the public, how to map a journey, analyze data, etc. They are not used because there is no high-level mandate to do so. Low-level mandates – like the CX CAP goal to survey customer satisfaction – have been done in a way to satisfy the requirement not woven into the way work gets done. For example: the VA 'trust' scores are viewed as best in class across the federal government. Having dug into the data myself: ~80% of the "I trust the VA" scores come from Outpatient side of the agency, and ~80% of those are pharmacy pickups, which isn't exactly the hardest service to deliver. Many people have been quick to cite improvements to VA Trust scores as an indication of broad progress or validation of some unrelated initiative. How many of them even know that 2/3 of the data behind that number is from a simple Rx pickup survey?

10. CX in the private sector is driven by economics, not mandates

Human centered design and other CX efforts have worked in business because those practices result in attracting and retaining customers and show direct financial returns. Without an

equivalent driver, we should stop expecting these practices to have a similar impact in government. The context is different.